

IMPERIAL SAND DUNES RECREATION AREA BUSINESS PLAN

Distributed

August 21, 2003



TABLE OF CONTENTS

Executive Summary	4
Plan Implementation Summary	6
Preparation	6
Communication & Introduction	7
Implementation	8
Evaluation & Reaction	9
Situation Analysis / Background Primer	10
Alphabet Soup	10
What is OHV?	10
Who is the BLM?	10
Supply-and-Demand	11
Funding Federal Recreation Programs	12
Appropriations	12
Grants	12
California OHMVR & OHV Trust Fund Grants	12
OHV Trust Fund (a.k.a. "Green Sticker") Expenditures	12
Volunteer Programs	13
Table 1, 2002 Volunteer Support	13
Fees	13
Market Analysis	18
Customer Profile	18
Table 2, County Population Projections Through 2020	18
Competitive Review	19
Federal Recreation Lands	19
State of California	19
Other OHV Areas	19
Table 3, Fee Ranges for Agencies within Southern California Geographical Area	20
Market Niche Matrix	20
Table 4, Market Niche Matrix	21
Table 5, Preferred Type of Outdoor Recreation Area, California State Parks	22
Pricing Strategy	23
BLM Fee Policies	23
Public Acceptance of Fees	23
Pricing	23
Visitation	23
Table 6, ISDRA Holiday Public Safety Staffing	24
Volume / Capacity	24
Interchangeable Passes	24
Visitation Statistics with Projections	25
Cost-Recovery / Breakeven Analysis	25
Table 7, Cost-Recovery/Breakeven Analysis - ALL Vehicles	27
Table 8, Cost-Recovery/Breakeven Analysis - NON-Holiday Vehciles	28
Table 9, Cost-Recovery/Breakeven Analysis - HOLIDAY Vehicles	29
Table 10, RAMP Action Items Included in Fee Calculation	30
Fee Collection Strategies	33
Suggested Methodologies	33
Table 12 - Collection Strategy Pros and Cons	36
Overarching Concerns	37
North Algodones Dunes Wilderness	38
Events Participants and Sponsor Members	38
Self-Pay Machine Contract Extension	39
Vendors	41
Table 14, Vendor Fee Market Analysis	45
Communication Strategy	47
Implementation	47

Signing	47
Kiosks	47
Enforcement	48
Direct Mail	48
Internet	49
Telephonic Information	49
Feedback / Surveys	49
Special Interest Groups / Associations	49
Vendors	50
Trade Shows	50
Media—Print and Radio and Local Cable	50
Elected and Appointed Public Officials	50
Appendix 1 - Customer Feedback Card	51
Appendix 2 - Internet & Direct Mail Survey Instrument	54
Appendix 3 - Sample: Little Sahara Notice of Violation	56
Appendix 4 - Sample: Sand Mountain Warning	57
Appendix 5 - Visitation at Various California Attractions	58

EXECUTIVE SUMMARY

This business plan analyzes the cost of managing the Imperial Sand Dunes Recreation Area (ISDRA) and securing reliable sources of funds to pay for these costs. The costs were based on activities and services BLM identified in the proposed action in the final EIS. Although there may be some changes to the activities and services when the Record of Decision is signed, BLM anticipates that the cost estimates used in this business plan will be adequate to manage the ISDRA. The costs of managing the ISDRA have increased substantially in the last two years. During the same time, the amount and reliability of funds to pay for these increased costs have dropped considerably. As a result, BLM has been operating the Dunes at a huge deficit. BLM in Washington, D.C. and California have bailed out the Dunes by cancelling projects and cutting staffing throughout the state, but this will no longer be possible.

Recreation fees and congressional add-on appropriations during the last few years have helped pay for some Dunes expenses; however, the cost of managing the Dunes and implementing the Zero-Tolerance policy on unsafe visitor behavior have greatly exceeded the dollars available from grants, fees, and Congress. To pay for this deficit, statewide BLM appropriations have been funding the \$2 million per annum Zero-Tolerance policy at the expense of on-the-ground maintenance and staff shortages at BLM Field Offices throughout the state—Washington and Sacramento have informed the El Centro Field Office that this will not continue. OHV Trust Fund Grants are less likely to fund the ongoing operations and maintenance (law enforcement, EMS, communications, site improvements, roadway maintenance, etc.) necessary to operate the Imperial Sand Dunes. The change in focus and purpose of the program also makes it unreliable for funding multi-year commitments, such as personnel expenses, roadway maintenance and contracted services. OHV Trust Funds are no longer as available for tangible, ongoing Operations and Maintenance (O&M) expenses—70% of the fund being earmarked for conservation uses only. Competition for Fund grants has doubled during the past year, from \$25 million to \$40 million in requests. The new process, documentation and research requirements make the grants more cumbersome and expensive to administer.

Therefore, the BLM intends to utilize a more focused, cost-recovery Use Fee strategy to manage site maintenance, on-site staffing, law enforcement, Emergency Medical Services (EMS), resource management and temporal visitation to 1) reduce dependency upon outside labor, 2) reduce dependency upon unpredictable—and shrinking grant funds, 3) return to a more stable level of staffing, 4) provide a consistent on-site presence, and 5) provide tangible services to visitors.

The cost-recovery analysis is based upon phased implementation of the new Imperial Sand Dunes Recreation Area Management Plan (RAMP); analysis of program requirements, services and resultant costs; a review of visitor surveys; and on-site and telephonic interviews with OHV enthusiasts. **Compliance is the key to keeping the rates low.** ISDRA staff have endeavored to price the passes as near to the existing prices as possible—while recovering actual costs. Staff have also attempted to remain at or below the competitive pricing of other, similar agency passes. For example, “phasing in” Park Rangers, Law Enforcement Rangers and maintenance workers instead of hiring them all at once, utilizing existing, fully-depreciated equipment instead of disposing of equipment that has surpassed its budgeted useful life, and adopting a three-year road maintenance cycle instead of an annual maintenance cycle.

The greatest weakness of this plan is the lack of hard compliance and visitation data. Ultimately, the breakeven / cost-recovery analysis is based upon **gross permit sales** and **gross vehicle counts during the 2002-2003 visitor season**. *Analysis of these* gross numbers yielded an overall compliance ratio of 26% - 41%, the large range reflecting differing underlying assumptions and varying days of the week.

The past four years have demonstrated beyond doubt that the so-called “honor system” does not generate sufficient revenue to recover routine recreation program costs. The vast majority of visitors do NOT purchase passes unless they are personally “encouraged” to do so. Entrance/Exit stations and/or checkpoints must be established every weekend and they must be staffed with LEOs as well as park rangers and self-pay machine staff. Enforcement should focus upon positive customer-relations—conversation, information and education—to preserve OHV Recreation Areas and to keep permit prices low.

The BLM is committed to flexibility. The Recreation Fee Demo Program is intended to enable the agency to respond to local, fluctuating needs without depending solely upon the lengthy and uncertain congressional appropriations process. BLM staff can respond to less-than-projected revenues by slowing down implementation of certain services and acknowledging the inherent lead-time of hiring processes and service delivery. While not desired, nor intended, if mid-season sales and compliance are severely lagging projections, the fees can be increased to make up any shortfall *based upon the breakeven analysis for the actual compliance rate*—user groups should be made aware of this possibility when soliciting their assistance with education, distribution and compliance. Conversely, if fee revenues exceed projections, BLM staff can work with the respective user groups to either build up a cushion for future decreases in visitation, or to implement highly desired, on-the-ground services sooner than projected, or reduce fees.

While the total ISDRA budget is approximately \$6.1 million, more than \$2.3 million of that total is expended on contract Law Enforcement, Emergency Medical Services and the Incident Command System to provide appropriate services to the huge crowds gathering on six primary holiday weekends: *Halloween, Thanksgiving, New Years, Martin Luther King, Jr., Presidents Days and Easter*. After examining several approaches to absorbing these costs, we recommend that they be recovered through fees to the users that are necessitating them, i.e. the recreationists who visit on these six holiday weekends. By splitting these costs out separately from the ongoing Operations and Maintenance budget, the year-round, season-long level of services are more stable, and yield a lower projected cost-recovery permit price.

Yes, this means that the six “problem” weekends require separate, more expensive passes, but these must only be paid

by those people enjoying the increased level of services. ***This pricing strategy enables the “average Joe” to afford a Non-Holiday 7-Day Pass for less than the cost of visiting and camping at a California State Vehicular Recreation Area (SVRA), most of which charge \$10 per day.*** Recall too that the RAMP calls for increased restrictions and closures if certain visitation levels are exceeded. The only days that have thus far approached these “trigger” levels are the six holiday weekends; therefore, differential pricing should also support a temporal dispersion of visitors to defer implementation of the “negative” measures called for within the RAMP.

Staff observations and experience suggest that visitors to the ISDRA recreate about three times per year, but this estimate is anecdotal—no hard data exist. Permit sales for the past season reflect that season pass purchases comprised only 21% of total passes purchased. Staff believe that a lack of compliance explains the difference between perceived visit-frequency and season pass purchases; therefore, we recommend that the ALL-Season Pass continue to be priced at three times the Holiday Week Pass. Tracking and analysis of this ratio should be evaluated, not only in regard to its own effectiveness, but vis-a-vis the new BFO-wide permit which intends to experiment with a 4:1 season versus weekly pricing ratio.

Specifically, we recommend a Non-Holiday, 7-Day Pass price of \$30, a Holiday 7-Day Pass price of \$60, and an ALL-Holiday, ALL-Season Pass price of \$180.

Finally, as discussed by Technical Review Team (TRT) members, staff and on-the-ground users, compliance rates are actually higher during these six holiday weekends because of the increased law enforcement presence. As ISDRA management begins to increase non-holiday compliance efforts through new and broader permit distribution channels (sales outlets) and to increase the law enforcement presence on non-holiday weekends, the lower “normal” weekend and season prices should facilitate the desired increase in compliance.

PLAN IMPLEMENTATION SUMMARY

Preparation (2003, July - September)

TRAFFIC COUNTERS - The most important action in this list of recommended actions is the installation and configuration of traffic counters. installed not later than October 1 at each major access point within all of the respective management areas, including the North Algodones Dunes Wilderness and Mammoth Wash areas.

Counters must be upgraded to enable recording of Day-of-Week and Time-of-Day information. This data will provide invaluable assistance in determining staffing schedules for campsite visits and/or entrance/exit stations. In the future, the availability of this data will provide accurate information regarding compliance levels, staff detailing and cost-effectiveness.

ACCESS ROAD SIGNS - Not later than September 6, "Berma Shave" signs that announce the October 1 commencement of the new fee schedule should be installed along each access road. Each message should be "divided" among three or four signs and should be creative—even corny—to capture the spirit that made the original Berma Shave signs so popular.

SELF-PAY MACHINES - ISDRA staff should work with Universal Parking staff modify the self-pay machine software to issue the new holiday pass(es). ISDRA staff should also direct the contractor to change the "Pay Here" signs to reflect a more informational and, perhaps "friendlier" message, such as "Purchase Permit Here."

CAMPSITE VISITS - Campsite visits provide a higher level of customer interaction which, in turn, enables more individualized customer service and feedback; therefore, both Park and LEO Rangers must make a determined effort to make campsite visits throughout their shifts.

ENTRANCE STATIONS - Due to the BLM purchasing process, staff should immediately begin the process to purchase mobile entrance stations to be utilized on an experimental and rotational basis—beginning with Wash Road. **An on-site test-run should be completed not later than October 18, 2003.**

INTERNET SALES - In July, work with the BLM State Office computer staff to incorporate the ISDRA Passes into the online store—unless there is a regulatory or procedural reason that would prevent such a transaction from meeting the Recreation Fee Demo program requirements and thereby not come directly back to the ISDRA. If there is a problem interfacing with the existing online store, then contact the programmer that the Arizona State Office used to develop their online sales site (~\$10,000 - \$15,000; therefore, pursue the existing BLM online store first).

A Permit Order Form should also be placed on the ISDRA website that can be printed out, completed by hand, and either mailed or "faxed" with payment information, to the El Centro Field Office (ECFO).

SEASON PERMIT PRINTING - The ISDRA should coordinate

the design, ordering and printing of their Season Passes with other Field Offices. Some forethought and supportive communication will ensure that the passes are not similar enough to cause confusion.

WEEKLY PERMIT PRINTING - ISDRA staff should coordinate with the self-pay machine contractor to ensure that the color-coded tapes (receipt rolls) are changed on dates that reinforce the holiday permit schedule instead of the historical "month-end" basis.

CONSIGNMENT CONTRACTING - ISDRA staff should immediately consult with CDD- and State-level BLM Contracting Officers to investigate the feasibility (vis-a-vis internal restrictions) and any contracting requirements of selling passes on consignment. While this plan calls for the immediate implementation of quantity discounts which would not require a contract, making the passes available on a consignment basis would certainly encourage more participation by not-for-profit organizations and commercial enterprises. Therefore, consultation with the relevant Contracting Officers should quickly determine the feasibility before investing too much staff time into the concept.

ENTRANCE STATION STAFFING - Entrance/Exit stations should be staffed by two people at minimum (one of which must be a LEO to enforce compliance) every weekend, Friday through Monday as of September 12. Vehicles should be stopped and personally informed of the new fees both verbally and via a brochure. The brochure should include a mail-in order form and the web address to purchase passes online—prior to the customer's next visit. Any new staff should be hired as soon as possible and a rotation schedule developed that will expose all existing, public contact personnel (Park Rangers, LEOs and Outdoor Recreation Planners [ORPs] from throughout the ECFO), as well as the new staff, to the experience—not just to spread the burden, but to help each understand the real, on-the-ground issues and public reactions which will help in developing a coordinated, permanent schedule of appropriate staff levels and hours of operation. *Representatives from interested User Groups, as well as the TRT should be invited to assist, or at least observe, with the on-site collection locations.*

HOLIDAY WEEKEND STAFFING - On the holiday weekends, the Entry Stations should be fully-staffed during the peak entrance and exit periods, even if it means incurring some overtime costs because your professional staff will not only increase compliance, but will develop some hard numbers regarding time of arrival and departure, duplicate trips by permitted vehicles, BLM staff trips, ratio of weekly vs season passes, ratio of previously purchased passes to on-site purchases, number of visitors per vehicle and number of OHV vehicles per permit vehicle. The overtime pay will be more cost effective than hiring a third party to gather such rudimentary data and it will ensure that all of your staff experience not just the numbers, but the customers.

ENTRY STATION SIGNS - change the "Pay Here" signs on existing machines to read:

Stop PURCHASE PASS HERE	
7-Day Permit:	\$ 30
7-Day <i>Holiday</i> :	\$ 60
PASSPORT:	\$180
(ALL WEEKENDS, ALL YEAR)	

Additional signs should be located closer to the driver- and pedestrian-level (in smaller print) on each side of the self-pay islands and on all four sides of the new mobile entrance station:

2003 Fee Public Land Fee Comparison				
Day Use / Weekly				
	Forest Service Adventure Pass (Limited Use OHV)	California OHV Recreation Areas	National Park Service (No OHV Allowed)	ISDRA Permit (Best Value)
Entrance	\$5	\$4	\$10 (7 days)	- 0 -
Use Pass				\$30 (7 days)
Overnight/Camping (Undeveloped Sites)	0	NO NIGHT RIDING NO CAMPING	\$4 - \$12 (nightly)	- 0 -
Daily Total	\$5	\$4	\$14 - \$22	\$4.29
7-Day Total	\$35	\$28	\$38 - \$94	\$30
Season Pass				
Entrance	\$30	\$40	\$50	- 0 -
Use Pass				\$60
Overnight/Camping	0	NO NIGHT RIDING NO CAMPING	NIGHTLY RATE STILL APPLIES	0
Season Pass Total	\$30 (LIMITED USE OHV)	\$40	\$78 + (NO OHV)	\$180

Communication & Introduction (2003, July . . . on-going)

ACCESS ROAD SIGNS - see same within preceding section. maintain.

USER GROUP PRESENTATIONS - Two or three joint (user groups) presentations should be made throughout the summer. As previously discussed, "To Fee or Not to Fee" is not the purpose of the meeting, rather information sharing, opening lines of communication and identifying glaring errors in the number-crunching process. Specific talking points are discussed within the Communication Strategy section of this document.

DIRECT MAIL - Within one month of completing the User Group Presentations, the El Centro and Barstow Field Offices should make a combined mailing to announce the new rates at the ISDRA and the new fees throughout the BFO to all of the existing ISDRA permit holders—whose addresses El Centro has on record—as well as to all interested mailing lists at both Field Offices.

e-MAIL - Simultaneous with the direct mailing, each office should send similar, but separate, e-mail notification of the new permit fees to all interested e-mail lists that they

WEB SITE - The State Office website and El Centro subdirectory sites should all be modified during July to include a highly visible link to "Fee Demo Use Passes" with a sub-link to "Use pass Areas/Sites and Fees."

TELEPHONIC RECORDINGS - Each Field Office should install a dedicated phone line with pre-recorded messages and promote the phone number alongside the Internet address (URL) in all roadway signs, direct mail, and e-mail communications. Inexpensive machines that enable up to three pre-recorded messages are readily available at retail for less than \$50. These dedicated lines and machines should be operating not later than September 12, 2003.

TRADE SHOW(S) - The ISDRA and BFO should coordinate schedules so that each office covers one of the following two fall expos, or perhaps rotate staff and expense so that both offices share the expense and staff both shows together: Sand Sport Super Show (Fall ~ September, Costa Mesa), Off-Road Expo (Fall ~ October, Pomona).

PUBLIC SERVICE ANNOUNCEMENTS (PSAs)- ISDRA staff should work closely with the *TRT, ASA, ASF and DUNERS* to develop a series of monthly PSAs for release to radio and television stations throughout Imperial, Orange, Los Angeles, Riverside, San Bernardino, and San Diego counties in California and Maricopa, Pima and Yuma counties in Arizona.

ELECTED & PUBLIC OFFICIALS - Officials, whose jurisdictions encompass the ISDRA, need the personal attention discussed within the Communication Strategy section of this document, but they should also be included within all lists to which direct mail and e-mail communications are distributed (user groups, media announcements, etc.), so that they are aware of the ISDRA's efforts to communicate with their own constituents.

INFORMATION KIOSKS - While intended as a communication tool, the information kiosks are intended to accomplish two objectives: 1) to encourage dispersed use to non-holiday weekends, and 2) to inform the public of the use of their permit fee money. Therefore, it is a critical component of the communication strategy, but it does not need to be implemented until the latter half of the season.

Implementation (2003, October . . . on-going)

PERMIT FULFILLMENT - An ECFO staff person should be tasked the internal responsibility of fulfilling Internet, direct mail and telephonic orders. Existing BLM cash-handling policies suggest someone within "cashiering;" however, consideration should also be given to the occasional need to make in-person contact with human distribution channels—User Groups, Vendors, and field personnel.

PRE-SEASON SALES - Pre-season (August - September) sales should commence as soon as possible through the Internet and direct mail (the relevant addresses should be promoted at the User Group presentations). Following the presentations, the respective User Groups should be encouraged to sell the passes, as Vendors, through their memberships, web sites, newsletters and events. The benefit to User Groups is two-fold:

- 1) The key to keeping the permit price low is high levels of compliance; therefore, while the associations will probably oppose the fee concept, they will do their members a service by helping to increase compliance, and
- 2) If they are really concerned about the cost of collection not being fair to their membership, they can pass the discounted price to their members.

ENFORCEMENT - Actual on-site collection should commence October 1, 2003; however, the ISDRA remains understaffed; therefore, it is not practical to task existing staff to mid-week collection duty, nor to commit to hire new staff without sufficient funds to pay them. Weekend staffing must, therefore, be the focus during October and November while actual sales are compared to vehicle counts and projections.

SCHEDULING - Minimally, entrance station staffing schedules should be developed for 12 Noon Friday through 12 Noon Monday on normal weekends. Holiday weekends should extend the schedule through 12 Noon Tuesday, excepting Thanksgiving, which suggests a schedule of 12 Noon the Friday before Thanksgiving through 12 Noon the Tuesday following Thanksgiving. Saturday and Sunday schedules should initially be set from 6 a.m. to 9 p.m. to provide valuable data collection—specifically, to check morning departures for passes that might not have been purchased the previous night. The respective user groups should be

invited to help staff the stations so that they can all experience "first-hand" the impact upon traffic flow, and visitor questions and reactions.

TIMING/SEQUENCING - To develop the necessary "hard" data needed for determining a permanent staffing schedule, all of the traffic counters at each access point/road should be configured to record and report the time-of-day and the day-of-week, not just monthly totals. December historically experiences less visitation than the other months of the recreation season; therefore, the October and November trends should be used to establish a more permanent schedule and to then hire the appropriate personnel to implement the schedule not later than January 1, 2004.

DIFFERENTIAL PRICING - The BFO is going to implement differential pricing for different distribution channels (sales methodologies) to encourage less expensive purchasing habits; thereby, lowering the overall costs of program administration. However, the most expensive program component is labor to ensure compliance. Furthermore, regardless of the manner in which customers purchase and receive their permit; someone on-the-ground must verify that the permit is present.

Therefore, we suggest that the ISDRA continue as-is, but keep an eye on the BFO experience to determine if it might provide a more user-friendly and cost-effective approach for future seasons.

Internet

Internet sales could be fulfilled via direct mail, or online purchasers could be directed to to present their online receipt to the entrance/exit or ranger station in exchange for the actual permit. Of course, while this avoids additional distribution costs, it is more easily forged (basically through duplication of the payment receipt), which requires additional record-keeping and visual inspection of each receipt against a log of already collected receipt numbers.

User Group and Vendor

User Group and Vendor distribution channels would absorb primary staff and postage fulfillment costs; therefore, ISDRA will provide a 15% discount ("wholesale") price to them. Initially, this can be provided through volume discounts, but once the BLM contracting office develops an acceptable *Vendor Agreement*, volume (i.e. minimum orders) might not be a necessary requirement.

Self-Pay Machines

Self-Pay machine contractors should be considered vendors because they provide the same service as any other vendor. However, they may likely seek a higher discount rate ("commission") because they are being required to provide, install and service expensive, electronic equipment (\$12,000 - \$15,000 per machine); to finance the "change" in the machines; and to incur cash-handling risks. Therefore, based upon past experience and these requirements a 15% - 20% "commission" to a Self-Pay machine contractor is not unreasonable.

ENFORCEMENT - In October, an LEO and Park Ranger should make campsite visits to:

- 1) disseminate information about the new fee schedule,
- 2) verify Use Passes and either sell a Permit on-the-spot or tell visitors to pick one up at the entrance station,
- 3) inform that entry/exit checks will continue throughout the season; therefore, the visitors' departure will be easier if they purchase passes prior to their visit, or at

- the least, upon arrival, and
- 4) remind that LEOs can and do issue the citation as a violation of California Vehicular Code that carries a higher fine and is pursued through the local county court system.

In November, *Notices of Non-Compliance* should be issued by all personnel, but visitors should actually be allowed to “exchange” them (*the notices, not actual tickets/citations*), for passes prior to departing the recreation area. (See *discussion within Overarching Concerns, Compliance, page 37*).

Evaluation & Reaction (2003, November . . . on-going)

Initially, as discussed above, evaluation will focus upon number of passes sold, ratio of number of Weekly Passes to number of Season passes, and total passes sold as a percentage of total vehicle counts and as a percentage of vehicle counts during the hours of operation. The analysis should also differentiate between the number of passes sold upon ENTRANCE and the number of passes sold upon EXIT.

These data should then be used to develop a “permanent” hours of operation/staffing plan for the entrance station.

A mid-season review should be conducted at the end of January which compares year-to-date income (and permit numbers) and expense to the projections within this plan. This review should not only include the TRT, but should be shared openly with any interested user groups and members of the public. If the results vary significantly from the plan projections, anticipated impacts and, if necessary, corrective strategies should be discussed, chosen and acted upon.

The final determinations of the review should be communicated on the web site, and enlarged and mounted in a professional manner on each information kiosk and the entrance station.

At the end of the season, a summary review and “annual report” should be developed. This report should also be enlarged and mounted as the mid-year report, but should also be incorporated into a readily available and broadly distributed self-mailer brochure, e-mail attachment, and web page.

Each version should include a form and/or link to encourage the purchase of next season’s pass and to sound-off through a survey tool, such as the sample within the Communication Strategy.

Focus Groups

Words apparently remain the poorest form of communication that mankind has developed. We have found that in addition to letters, e-mails and telephone conversations, more formalized focus groups provide for a broader range of criticism and discussion that enables often-overlooked issues to be recognized through brainstorming and concept-association. Such focus groups should be comprised of disparate viewpoints—personalities that do not normally associate with one another in any other aspect of their lives. This helps to lessen the risk of “group-think” decisions which are notoriously inferior to individualized decisions.

This document attempts to demonstrate a method to pay for and implement mandated environmental and legal requirements while remaining responsive to the OHV community in a manner that will keep the BLM-managed OHV areas open to the recreating public. (This section is intended for those not familiar with the BLM, OHV, or the recent funding history of the program. The actual business plan begins on page 15).

ALPHABET SOUP

What is OHV?

OHVs are motorized recreational vehicles designed for off-highway use (**Off-Highway Vehicle**). In the early days of the sport they were referred to as “**Off-Road Vehicles (ORVs)**.” These types of vehicles include, but are not necessarily limited to, all terrain vehicles (ATVs)—generally 4-wheeled and commonly referred to as “quads,” some older 3-wheeled versions are still in use), motorcycles (dirt bikes, not street bikes), Jeeps, four-wheel drive pickups (4x4s), dune buggies, “baja” bugs (modified Volkswagen Beetles), sand rails (of varying dimensions, but generally recognized by appearance to be “all chassis,” although many now have bodies) and, recently, modified golf carts.

Such vehicles, depending upon their design and construction, may or may not be street legal. Vehicles may have a generalized Off-Highway purpose, or they may be designed for a specific purpose ranging from desert terrain to rock crawling to sand dune climbing and racing—there is literally something-for-everyone.

Thus, OHV Recreation is the sport of driving these vehicles. Just as the terrain varies, so does the purpose of driving vary. Some enthusiasts race against each other, others are simply exploring backcountry that would otherwise be inaccessible, some are testing their skills and wits at maneuvering difficult terrain, and many are just enjoying a common interest with their children that facilitates communication.

Who is the BLM?

This document focuses upon the **Imperial Sand Dunes Recreation Area (ISDRA) managed by the El Centro Field Office of the California Desert District of the BLM—Bureau of Land Management, Department of the Interior.**

The Bureau of Land Management (BLM) manages more than 262 million acres of public land throughout the United States. That’s almost one-eighth of all our land in the continental U.S. Most of the BLM-managed land is located in the American West and Alaska. BLM land is a legacy of the original territory claimed by the federal government early in our nation’s history. Much of the land was originally claimed for homesteads, railroads, and other private purposes, but much was also set aside for parks, wildlife refuges, national forests, military bases or other public uses. What remains today was cast-off as uninhabitable, or non-productive, or simply never claimed. Ironically, today that same land comprises some of the most prized recreation and holiday destinations in the world.

The BLM **balances three Multiple-Use categories:**

- 1) **commercial activities,**
- 2) **recreation, and**
- 3) **conservation.**

These multiple uses oftentimes seem contradictory, but the agency is challenged with this balancing act. BLM lands are crucial open-space buffer areas that mitigate the pressures of rapid population growth.

Land use planning is one of the most important tools that the agency has, and the BLM is one of the best—if not the best—agency in terms of consistent, Multiple-Use

management. *Every major land use decision that the agency makes is governed by a well-defined planning process established under the Federal Land Policy and Management Act (FLPMA) of 1976.*

Most on-the-ground work is accomplished in *Field Offices*, such as the El Centro Field Office. Responsibility for specific sites and programs, such as the Imperial Sand Dunes Recreation Area, Superstition Mountain and Placer City Open Areas, and the Lark Canyon OHV Area, Cottonwood Campground, Tumco Historic Site and Long Term Visitor Areas (LTVAs), such as Hot Springs and Pilot Knob lies with such specialists as wildlife biologists, mining engineers, range conservationists, archaeologists, recreation planners and law enforcement officers. These specialists formulate and implement **complementary plans and recommendations for developing and conserving** the area’s resources.

District Offices provide administrative and operational support to the Resource Area Offices, and coordination and liaison with the respective State Office. *State Offices and most District Offices also maintain “public rooms” for the public to examine records for all public land transactions, such as rights-of-way and state land grants, oil and gas leases, and mining claims. Public land survey records are also maintained in the public rooms.*

Responsibility—Environmental

The BLM actively supports the **treadlightly!** education program which teaches members and non-members alike to minimize their impact(s) upon the natural environment—especially through their routine cleanups on holiday weekends and example-setting with friends and family. The treadlightly! Pledge says it well:



TTravel and recreate with minimum impact.

Respect the environment and the rights of others.

Educate yourself--plan and prepare before you go.

Allow for future use—leave it better than you found it.

Discover the rewards of responsible recreation.

For more information about the **treadlightly!** program, visit its web site at <http://www.treadlightly.org>.

The BLM has also been an avid supporter, participant and guide of the **Leave No Trace** program since May 1993 (<http://www.lnt.org/history.html>). The **Leave No Trace** principles may not seem important at first glance, but their value is apparent when combining the effects of millions of outdoor visitors. One poorly located campsite or fire ring is of little significance, but thousands of such instances slowly degrade the outdoor experience for all.



Responsibility—Law Enforcement

In addition to coordination, education, management, planning and protection, the BLM is required to enforce applicable state and federal regulations on public lands. Many of the OHV self-policing activities have been codified into law since 1971—the first year of the *California Off-*

Highway Vehicle Recreation Program. The following summarizes the more prominent of those regulations:

- **OHV REGISTRATION REQUIREMENTS** - In order to operate any type of motorized vehicle off-road on public land (at all jurisdictional levels), you must have one of the following:
 - **STREET-LEGAL LICENSE PLATE** - If you want to operate a 4-wheel drive vehicle or dual-purpose motorcycle on-road and off-road, you must have a street-legal license plate.
 - **OFF-HIGHWAY VEHICLE STICKERS** - All vehicles that are operated on public lands must be registered with the Department of Motor Vehicles (DMV). The registration fee is \$21 per vehicle, and is valid for a two-year period. The OHV fund is used for acquisition of new OHV areas, development and operation of existing OHV areas, enforcement of the rules and regulations, and protection of the natural resources. The DMV will issue a Green or Red Sticker for off-road vehicles. Vehicles that can be operated both on- and off-highway will be given a street-legal license.
 - **GREEN STICKER OR RED STICKER** - If you are going to operate a motorized vehicle off-road only, you must have either a Green Sticker or a Red Sticker that has been issued by the Department of Motor Vehicles. The Green Sticker allows vehicles to operate on public land all year. The Red Sticker is for motorcycles and ATVs manufactured after January 1, 2003 that do not meet the emission standards established by the California Air Resources Board. If the vehicle has a 3 or a C in the eighth position of the Vehicle Identification Number, then it does not meet the emission standards and should be issued a Red Sticker. The Red Sticker is exactly the same as the Green Sticker except that Red Sticker vehicles can only be operated during certain times of the year. To find out when you can operate your vehicle, contact the specific riding area that you want to visit.
 - **NON-RESIDENT PERMIT** - As of January 1, 1998 out-of-state visitors must purchase a special "Non-Resident OHV Permit" if their off-highway vehicle or snowmobile is not registered in their home state. *[Not all states require registration of OHVs].*
- **POSSESSION OF ALCOHOL** - A new law makes it illegal to possess an open container of an alcoholic beverage while riding in or operating an off-highway vehicle. Vehicle Codes sections 23220, 23322, 23223, 23225, and 23226, have been amended to include public lands. *(The intent of these laws is to make the possession of alcohol in a vehicle the same whether you are driving on a highway or off-road). The new laws are designed to reduce alcohol-related accidents, but also allow vehicles to transport such items in locked containers, or even ice chests, if they are secured in a manner that is not accessible to the occupants or the operator.*
- **SPARK ARRESTERS/MUFFLERS** - Off-Highway vehicles must be equipped with a U.S. Forest Service-approved spark

arrester and adequate muffler, both in working order (PRC 4442 & 43 CFR 8343.1 ¶C)

- **SAFE OPERATION** - You may not drive a motor vehicle in a manner that endangers the safety of other persons or their property (CVC 38305, 38314, 38316a, 38317).
- **SPEED LIMITS** - No motor vehicle shall exceed 15 mph within 50 feet of any campground, campsite, or concentration of people or animals (CVC 38310).
- **LIGHTS** - Any vehicle operated from ½-hour after sunset to ½-hour before sunrise must display at least one headlight that enables an operator to clearly see 200 feet ahead and one red taillight visible for 200 feet (CVC 38335, 38345).

SUPPLY-AND-DEMAND

The majority of OHV (a.k.a. "Off-Highway") recreation in California occurs on federal lands. The opportunities available for OHV recreation on these lands has dropped dramatically in the last 10 years.

During this same time period, California's population grew approximately 40 percent. The U.S. Census Bureau estimates that California's population will increase 39 percent between 2000 and 2020, expanding from approximately 32 million to 45 million people.

The supply and demand relationship between California's population centers, relative to both human population and OHV registrations, and the associated amount of legally accessible motorized off-highway recreation opportunities provided near those population centers is unbalanced. California's most heavily used OHV areas are in Southern California, where riding areas have decreased and the population has increased. At one time, local OHV opportunities were accessible to Southern Californians, even within such heavily urbanized counties as Orange, Los Angeles, and San Diego. As regional populations increased within these areas and the usable OHV land base decreased, outlying rural areas began to receive heavier use—resulting in increased user conflicts. The situation is now exacerbated by increased interest in and legal decisions protecting natural resources within rural riding areas.

As evidenced by the draft Recreation Area Management Plan (RAMP) for the Imperial Sand Dunes (El Centro Field Office of the BLM's California Desert District), legal and regulatory decisions can force closures of OHV areas based upon perceived and/or potential impacts of OHV use. Not only does the lawsuit in El Centro require strategic planning and monitoring, but the California OHV Trust Fund requires the same of any and all grant applicants. Therefore, the BLM is taking a pro-active position to fulfill its Multiple-Use mandate through education, human and natural resource protection (on-the-ground law enforcement and emergency medical services), restoration and strategic planning. Failing to do so will result in areas currently authorized for legal OHV use falling out of compliance with state and federal regulations and thereby potentially being restricted or closed. Elimination of managed OHV recreation areas on federal lands would have serious consequences on public and private lands.

This document attempts to demonstrate a method to pay for and implement these mandated requirements that is

responsive to the public, while keeping the ISDRA open to OHV recreation.

FUNDING FEDERAL RECREATION PROGRAMS

Appropriations

Appropriations are the monies that the United States Congress and President provide to the various federal agencies, through the annual budgeting process, to fund their respective program activities and staff.

BLM appropriations have remained **stable** for the past several years; **however**, since 1986, these funds **have not even covered the baseline Operation and Maintenance costs**.

Grants

With stable appropriations in the face of increasing planning, environmental and regulatory costs, BLM Recreation Areas within the State of California have grown increasingly dependent upon the California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division (OHMVR) Trust Fund. However, these funds are not a be-all, end-all solution—quite the contrary, distributions from the fund have been steadily decreasing over the past three years.

A principal motivation to this particular pricing strategy is the realization that OHV Trust Fund Grants will no longer be adequate to fund the ongoing operations and maintenance (law enforcement, EMS, communications, site improvements, etc) necessary to operate OHV Open Areas in the safe and responsible manner required by law. Initially, this was an educated guess based upon downward trends in grant awards vis-a-vis previous year awards, and the observation that \$25 million in applications were made for the fiscal 2003 funding cycle, while only \$16 million in Grant Funds were available. This expectation is now a documented fact with the passage of AB2274 (*cf. discussion within the next section of this document*). Therefore, the BLM intends to develop a more focused and logical Use Fee strategy to reduce dependency upon these now unpredictable and shrinking grant funds.

California OHMVR & OHV Trust Fund Grants

Contrary to popular belief, the OHV program is not financed entirely from the fee paid to register an OHV with a “Green Sticker.” The OHV Trust Fund receives only \$8 of the \$21 biennial OHV registration fee.

Of the \$21 fee, the Department of Motor Vehicles receives \$7 to cover administrative costs associated with OHV registration. The California Highway Patrol (CHP) receives \$2 per registration for OHV-related law enforcement and OHV accident investigations. Cities and counties receive \$4 of the OHV registration fee in lieu of property taxes on off-highway vehicles. Local agencies can use these funds for OHV law enforcement, repair of damage caused by illegal OHV activity, or even to provide a local OHV park for enthusiasts in the area. The money is distributed based upon the census population of each city and county; therefore, rural cities and counties with high OHV visitation receive only minimal in lieu of funding because of their small populations. *For example, sparsely populated Imperial County, a prime destination for urban OHV enthusiasts traveling to the Imperial Sand Dunes, received \$2,117 in 1999/2000. In contrast, Los Angeles*

County received \$144,454 yet maintains little recreational opportunity.

OHV Trust Funds never have—and likely never will—come close to meeting either the needs of OHV enthusiasts or the many legal requirements for resource conservation and law enforcement associated with today's OHV program.

OHV Trust Fund (a.k.a. “Green Sticker”) Expenditures

The OHV Trust Fund is appropriated by the California State Legislature and approved by the Governor through the budget process. Through this process, funds are appropriated in three major categories:

Support covers all expenditures within the California OHMVR Commission and its own State Vehicular Recreation Areas (SVRAs)—except capital outlay and local assistance.

Capital Outlay includes acquisition and development of SVRAs.

Local Assistance Grants are made to local and federal agencies to develop, maintain, and manage OHV areas on their lands. Public Resources Code Section 5090.61(a) allows for up to 50 percent, but in reality, only about **30% (~ \$16 million) of the OHV Trust Fund is used for grants to local communities, counties, and federal agencies**. The allocation of grant funds is overseen by the Off-Highway Motor Vehicle Recreation Commission.

In the past, the entire \$16 million was available for a diversity of OHV-related expenditures, such as operations & maintenance (O&M), capital improvements, and law enforcement. However, with the passage of California Assembly Bill 2274, 62% of these funds must be spent on conservation, enforcement and restoration—leaving less than \$5 million available for O&M, capital, or law enforcement grants.

With only \$16 million available for fiscal 2003, the OHV Trust Fund received more than \$25 million in requests. For fiscal 2004 OHMVR has received \$40 million in grant requests, but only has \$17 million (46% of the requests) in available Grant Funds. ***It is doubtful that any one agency will receive sufficient funding to maintain existing operations without another source of revenue.***

Furthermore, the BLM is now required by the OHMVR to meet much tougher standards for management of its natural resources and the OHV Trust Fund Commission now requires each grantee:

- develop WHPPs (Wildlife Habitat Protection Plan) specific to each OHV area,
- conduct research to determine the effects of OHV activity on wildlife and soils,
- ensure compliance with CEQA. (California Environmental Quality Act),
- make applications available for public review,
- host public meetings to solicit comments prior to submitting applications, and
- submit letters of support and opposition with its proposal submissions.

These new requirements make the **grant application process** more cumbersome and, therefore, not cost-

effective as a source of O&M funding.

In summary,

- 1) OHV Trust Funds are no longer as available for tangible, ongoing O&M expenses—70% of the fund being earmarked for environmental uses only.
- 2) Competition for Fund grants has nearly doubled during the past year, from \$25 million to \$40 million in requests.
- 3) The new process, documentation and research requirements make the grants so cumbersome and expensive to administer that it is no longer a cost- nor time-effective source of revenue.
- 4) The change in focus and purpose of the program also makes it unreliable for funding multi-year commitments, such as personnel expenses, roadway maintenance and contracted services.

VOLUNTEER PROGRAMS

BLM Visitors are also loyal and dedicated to their public lands. To sustain the health, productivity, and diversity of millions of acres of public land would be an insurmountable task without the help of volunteers. The BLM has effectively partnered with volunteers for years—thereby directly forestalling the introduction of user fees.



More than 3,500 volunteers receiving "marching orders" at the 2003 MLK Dunes Clean-Up.

Volunteer activities and support are as diverse as the personalities behind them—whether participating in 1-day events, serving as campground hosts throughout the summer, or coming in to the office on a daily basis, volunteers enable BLM to provide a wide range of services to public land visitors. The BLM places great emphasis on the fact that public lands belong to all Americans, but it is volunteers who take the responsibility of ownership seriously. They serve as an example to all citizens.

Last year's volunteers "staffed" the annual Imperial Sand Dunes Clean-Up, a joint Clean-up and Wilderness Restoration project at the ISDRA, the Hot Springs Restoration and Clean-Up and the National Public Lands Day project to clean-up the Table Mountain ACEC.

A-DAY-LATE-AND-A-DOLLAR-SHORT

1999 California Desert District Business Plan (CDDBP)

The *California Desert District Business Plan* evaluated potential Use Fee sites throughout southern California Field Offices. Fees have already been implemented throughout the CDD since adoption of the 1999 business plan. Specifically, the following non-OHV sites have implemented fees since the adoption of the 1999 CDDBP: Afton Canyon, Coon Hollow, Corn Springs, Fossil Falls, Owl Canyon and Wiley's Well Campgrounds, and Tumco. The *Imperial Sand Dunes* was the only OHV area within the

**Table 1, 2002 Volunteer Support
El Centro Field Office**

Program	Volunteer Hours
Recreation (Includes Dunes Patrol)	18,447
Biological Resources	56
Wild Horse and Burro	0
Cadastral Survey	0
Wilderness	160
Riparian/Watershed	0
Cultural/Historical	182
Minerals	0
Support Services	100
Environmental	176
Other	157
Total Hours	19,278
Value of Work	\$309,412

Fees

Recognizing the looming appropriations stagnation, the U.S. Congress authorized federal agencies to charge entrance fees, use fees, Special Recreation Permit (SRP) fees, or some combination thereof under provisions of the Land and Water Conservation Fund Act (LWCFA) and the Emergency Wetlands Resources Act (EWRA).

In 1996, the Bureau of Land Management, the National Park Service, the U.S. Fish and Wildlife Service and the U.S. Forest Service were directed by Congress to implement the Recreational Fee Demonstration Program at up to 100 projects per agency. This program allows for new or increased Entrance Fees, User Fees, or Special Recreation Fees to be collected. **Thus far, the BLM has returned 100% of the new revenue to the area/site where it was collected.**

- 1) **Entrance fees** are those fees charged for entering designated federal LWCFA, EWRA and Recreational Fee Demonstration areas.
- 2) **Use fees** are those fees charged for using facilities and services, such as campgrounds, camping pads, and access roads.
- 3) **Special Recreation Permit fees** are those fees charged for specialized uses, such as group activities, recreational events, and use of motorized recreational vehicles in designated federal LWCFA, EWRA and Recreational Fee Demonstration fee areas.

District to implement a use fee at that time—with the intent of providing tangible, on-the-ground services.

Shifting Sands—Welcome to the Real World

About the same time, some extreme lawlessness at the Dunes caught national media attention which resulted in a political edict to "fix it, regardless the cost." Of course, being a political edict, the directive came without adequate funding. Therefore, while the intent was good—and supported by the vast majority of Off-

Highway recreationists— implementation consumed ALL of the new fee monies, and OHV Trust Fund Grants focused almost exclusively on law enforcement.

Granted, a safer, more family-oriented riding environment was and is a priority among Off-Highway recreationists, but the “Zero-Tolerance” policy (as the directive is referred to) created an annual deficit exceeding \$2 million. The two million dollars had to come from somewhere—specifically, all other BLM Field Offices and administrative offices throughout California. While the Congress and Federal Reserve are allowed to play with fiat money, agency administrators are required to operate within balanced budgets; therefore, to compensate for the huge deficit caused by management of the Dunes and other projects, the BLM has delayed important maintenance projects; implemented a statewide hiring freeze which continues to this day; and diverted recreational, in-the-field staff to additional duties which detract from their ability to deliver the tangible recreational services originally promised in the *CDDBP*. Such measures exacerbate the negative cash flow because the agency must contract for seasonal, professional law enforcement and emergency medical personnel instead of hiring an appropriate number of employees—such staffing comes at a premium.

At the same time, the OHV Trust Fund became

somewhat politicized and the passage of AB2274 mandated a shift of grant funds away from OHV-related tangibles. Fortunately, OHV Trust Fund Grants did fund a small portion of the increased holiday law enforcement and a majority of the weekend law enforcement needs during the initial two years of the Zero-Tolerance policy, but those funds are less stable and cannot be depended upon for on-going staffing and budgetary commitments.

The overarching philosophy driving this document, “policy shift” to some, is the recognition that OHV Trust Fund (aka “Green Sticker” to the general public), Grants will no longer be available to fund the ongoing operations and maintenance (law enforcement, EMS, communications, site improvements, etc) necessary to operate OHV Open Areas in the safe and responsible manner required by law. Therefore, the BLM intends to utilize a more focused and logical Use Fee strategy to manage site maintenance, on-site staffing, law enforcement, EMS and temporal visitation to:

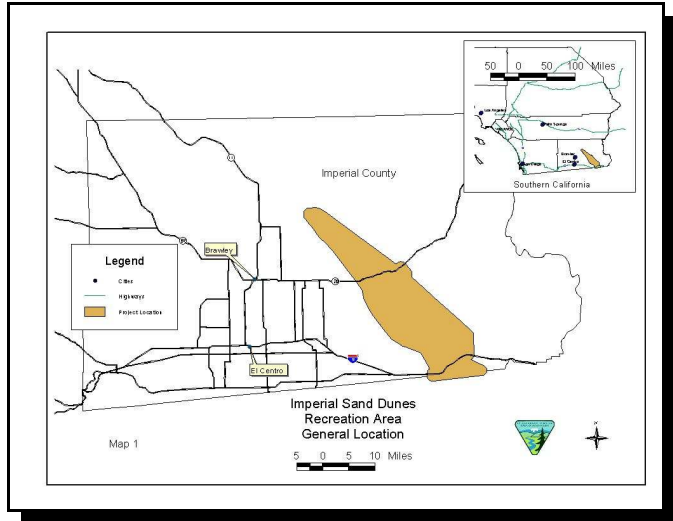
- reduce dependency upon contract labor,
- reduce dependency upon unpredictable, and shrinking grant funds,
- return to a more stable level of staffing,
- provide a consistent on-site presence, and
- provide tangible services to visitors.

IMPERIAL SAND DUNES RECREATION AREA BUSINESS PLAN

SITE DESCRIPTIONS

Narrative

The Imperial Sand Dunes Recreation Area (ISDRA), comprising approximately 159,072-acre contains the largest mass of sand dunes in California, covering an area more than 40 miles long and averaging 5 miles in width. Map 1 illustrates the regional location of the ISDRA.



Map 1, ISDRA Regional Location

The ISDRA is located on the eastern edge of Imperial County. The dunes are more than 40 miles long and have an average width of five miles. The new Coachella Canal is located near the western boundary of the dunes. The new Coachella Canal delivers Colorado River water to the fertile agricultural valley to the north. A major east-west route of the Union Pacific railroad skirts the eastern edge of the ISDRA.

Generally, the west boundary of the ISDRA follows the abandoned Old Coachella Canal, while the east boundary follows the Union Pacific Railroad. Exceptions to these boundaries include small areas of adjacent lands. These lands were included in the ISDRA boundary since this property already incurred heavy recreational use from ISDRA enthusiasts.

The dune system is currently divided into 3 areas. The northern most area is known as Mammoth Wash. South of Mammoth Wash is the North Algodones Dunes Wilderness established by the 1994 CDPA. This area is closed to mechanized use and access is by hiking and horseback. The largest and most heavily used area begins at Highway 78 and continues south just past Interstate 8 to the Mexican Border.

The ISDRA is considered a world-class OHV area and it represents one of the most popular OHV areas in the western United States. It is a well-known area to local residents and the thousands who visit each year from the southwestern United States and beyond. The ISDRA is the most heavily and intensively used OHV recreation area in the California Desert District with over 1.2 million OHV visitors per year. Visitation levels fluctuate tremendously, from almost zero (0) during the summer to almost 200,000 during Thanksgiving weekend. In addition, the ISDRA is recognized for its frequent use as a backdrop for commercials and movies because of its unique beauty and landscape. The ISDRA is also recognized for providing unique habitat for several endemic and sensitive plant, insect, and animal species.

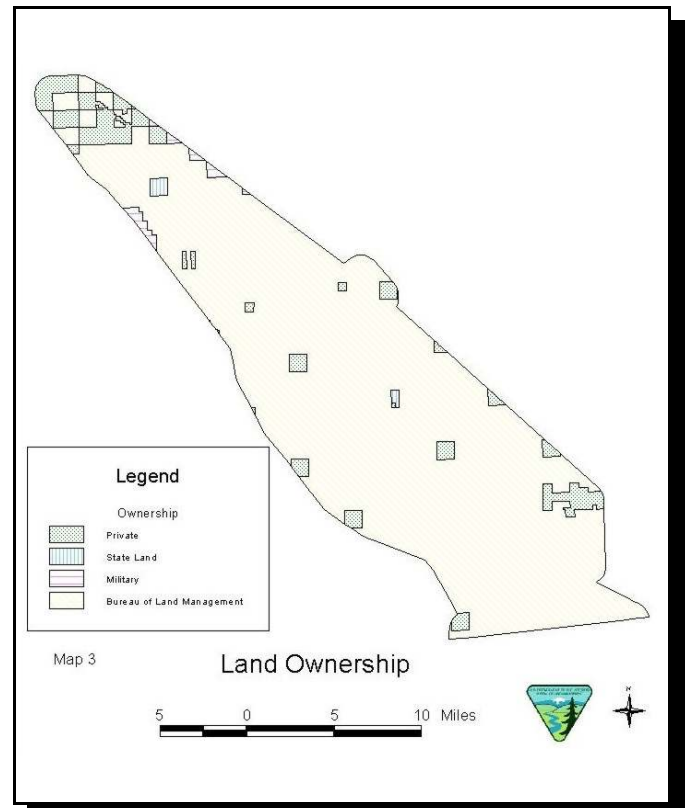
Currently, as a result of a negotiated settlement agreement between the BLM and a coalition of

environmental groups, several areas of the ISDRA are temporarily closed in order to protect various species.

The overwhelming popularity and regional importance of the ISDRA to visitors, recreational enthusiasts, and others require careful management to protect its recreational, natural, and cultural resources. As the designated steward of the ISDRA, the BLM El Centro Field Office is charged with the responsibility to oversee and manage this ecologically complex and beautiful public treasure.

Management Areas

The ISDRA will be managed and divided into several management areas. Each of these management areas will be managed under a specific Recreational Opportunity Spectrum (ROS) classification to meet the needs of the visitors and management. There will be an array of ROS management classes ranging from semi-primitive non-motorized to rural. Each of these management areas will have a visitor supply that will be met at least 85% of the time during the visitor season (Oct 1st - May 31st). If visitation exceeds the supply 15% of the time during the season, actions will be considered to limit access to the recreation area. Additionally, if visitation exceeds supply 20% of the time during the season or 15% of the time during the season for two consecutive years, more restrictive actions will be considered to limit access to the recreation area. OHV recreation resources will be maintained while conserving the natural, and cultural resources. The ISDRA will continue to provide the sociological and economical benefits it has in the past. Law enforcement, volunteer services staff, and emergency medical service staffing will be adequate for the fluctuating levels of visitation. Education and interpretation will promote proper land use ethics.



Map 2, ISDRA Land Ownership

Land Ownership

A mixed ownership pattern of private, state, county, military and public land exists in the planning area. (See Map 2.) Within the ISDRA Planning area, approximately 207,384 acres are managed by BLM; 16,085 acres are privately owned; 1,758 acres are owned by the United States military; and 906 acres are owned by the State of California. Land uses vary widely and include private residential, private commercial, military training, management of sensitive natural resources, law enforcement facilities, educational centers, wilderness, OHV recreation, other recreation, commercial vendors and commercial filming.

Law Enforcement

Presently throughout the season (October through May), the ISDRA is faced with numerous law enforcement issues, such as driving under the influence of drugs or alcohol, assaults on employees and the general public, under-age alcohol use, drug use, traffic violations such as speeding and double-riding, fee compliance violations, and resource violations (littering, natural feature destruction, dumping of hazardous materials, dumping of waste, etc.). There are six major weekends that attract extremely large crowds at the ISDRA. These weekends are *Halloween, Thanksgiving, New Year's, Martin Luther King Day, President's day and Easter*. Law enforcement issues increase during the holiday weekends. The types of behaviors exhibited are more violent than on routine weekends.

Large quantities of alcohol are consumed throughout the ISDRA but certain areas seem to have a greater amount of alcohol consumption. These areas are Competition Hills in both the north and south dunes, the "drags" in both the north and south dunes and Test Hill in the south dunes. Numerous people, mostly young adults and teenagers visit these areas at night when the "parties" are occurring simply to drink and participate in what is commonly referred to as a large drunken party. It is not uncommon to have beer bottles or cans thrown at the law enforcement officers who are working in the area from individuals in the crowd. Other individuals have been known to encourage this outrageous behavior in order to film the event or simply to watch the unacceptable behavior.

Until recently, law enforcement in the ISDRA was provided primarily by the BLM. The El Centro office has authorization to employ 9 patrol rangers, 2 supervisory rangers, and 1 chief ranger. The rangers regularly patrol the lands managed by BLM that are both inside and outside the dunes. However, the level of law enforcement is insufficient to ensure a safe and secure environment on holiday weekends without additional law enforcement support.

The BLM ranger's primary responsibility is to protect federal land resources. However, several years ago when the ISDRA began experiencing an increased number of individuals who visit the sand dunes in order to enjoy the "party" atmosphere that had developed, the law enforcement officer's role changed. *Due to this new clientele, the ranger's focus changed from OHV related safety incidents and resource violations to more serious crimes.*

Due to the ISDRA's location near the U.S. Mexican border, law enforcement activities are conducted by a number of agencies at the federal, state, county and local levels. Although each agency has specific missions and authorities, an overlap of jurisdictions and responsibilities is common. Three separate United States Border Patrol offices patrol the ISDRA. The Yuma Sector of the Border patrol covers the southeast portion of the Dunes while the El Centro and Calexico sectors patrol the remaining sections.

Growing problems surrounding some of the ISDRA's

clientele have demonstrated the need to establish better partnerships with state and local agencies. In an effort to improve law enforcement at the dunes, a Memorandum of Understanding was established with the Imperial County Sheriff's Office (ICSO). This Memorandum of Understanding formed a coalition of local law enforcement agencies to help provide law enforcement at the dunes. In addition, innovative approaches to law enforcement are being implemented. For example, an incident command system has been established to better coordinate the operations involving multiple agencies. It is necessary to increase the number of law enforcement officers in the ISDRA, on an interim basis, during the holiday weekends and non-holiday weekends to reduce the level of unacceptable behaviors.

On the holiday weekends, additional law enforcement resources from other federal, state and local government agencies are utilized. Approximately 15-30 additional federal law enforcement rangers and agents are detailed to the ISDRA on these major weekends. In addition, up to 35 local law enforcement officers are available on holiday weekends. The actual number of law enforcement officers varies from holiday to holiday with changing participants. On some holiday weekends, up to 150 law enforcement officers are available. In addition, a volunteer dunes patrol contributes to the efforts of law enforcement activities.

It is anticipated that the use of additional, non-BLM, law enforcement officers for behavior modification would allow BLM law enforcement officers to focus on their primary mission of safety, resource and land protection. Resource protection has become a greater priority at the ISDRA. Increased law enforcement presence is necessary on a regular basis in order to perform normal patrols concentrating on littering, dumping and vegetation destruction. Management of the wilderness area and conservation of several plants, animals, and insects is becoming more of a priority. The acquisition of additional vehicles has greatly improved BLM's ability to promote a safer environment and to protect natural resources.

Health and Safety

The main health and safety goal is to improve the health and safety of visitors, employees, and nearby residents by working with local, state, and federal agencies and interest groups. Another health and safety goal is to promote safety through education about the rules and regulations at the ISDRA. A third goal is to promote safety through law enforcement activities to improve compliance with the rules and regulations at ISDRA. Lastly, it is a health and safety goal to improve health by addressing the air quality around established roads with the management of dust and particulates through stabilization and/or reduction in accumulation, as appropriate and practical, and the enforcement of speed limitations.

Federal regulation Title 43 CFR Part 8340.0-2 directs BLM to protect the resources of public lands, to promote the safety of all users of those lands, and to minimize conflicts among the various users of those lands. Both the BLM and ISDRA visitors are concerned about compliance with laws and regulations and current law enforcement issues. Increasing visitor populations during the OHV-use season have created larger crowds throughout the ISDRA. In addition, there seems to be an increase in visitors with a reckless disregard for the ISDRA laws and regulations. During the six major holiday periods, there is a need to increase the level of enforcement without greatly impacting the quality of the recreational experience currently enjoyed by the majority of the visiting public.

The BLM has historically been the lead agency for law enforcement in the ISDRA. Within the last two years, Imperial County Sheriff Office (ICSO) has acquired four grants from the OHMVR division for law enforcement activities related to the ISDRA. This provides the opportunity for the ICSO to work more closely and cooperatively with the BLM to provide law enforcement services. If the ICSO provides a substantial amount of law enforcement it would allow the BLM Rangers to focus on federal and state laws, rules, and regulations while ICSO could handle state and local laws, rules and regulations. Some federal issues have not been adequately addressed due to a lack of Rangers. BLM does not have enough Rangers to create a safe environment during peak use times. On-going coordination with and supplemental use of other law enforcement officers will continue to be needed. Supplemental communication (radio and dispatching) will be necessary to allow Rangers to operate safely. In addition, the level of lawlessness in certain areas of the ISDRA creates an unsafe environment. The use of alcohol at these areas is believed to contribute to the level of lawlessness. The frequency of drinking and reckless driving at the ISDRA is at an unacceptable level. This, too, contributes to creating an unsafe environment.

As with any vehicle use activity, there are many rules and regulations. It is a health and safety goal to provide education concerning the rules and regulations relating to OHV use at

ISDRA. It is also a health and safety goal to provide education to encourage compliance with the rules about camping related issues such as disposal of trash and gray water.

At this time, the county emergency medical service providers offer different levels of service in different geographical areas in the ISDRA. In the Glamis and Gecko Areas, the county-contracted emergency medical service is generally limited to the on-road areas. When available, a county-contracted advanced life support provider will ride along with a BLM staff person when en route to a medical aid incident to offer assistance. In the Buttercup and Dune Buggy Flats Areas, the contracted county emergency medical service provider offers both on- and off-road assistance. They respond to incidents in non-BLM 4x4 vehicles to provide advanced life support medical aid.

OHV recreation is an inherently high-risk activity. In order to provide the best service for visitors to the area, the BLM has a staff of Rangers trained in basic life support. However, due to the increased visitation to the area there has been a need for an increased level of emergency medical service. In response to the increased visitation, BLM has implemented a fee program to increase its staff to accommodate the volume of emergency medical service incidents. As visitation levels and OHV recreation change over time, the BLM will work cooperatively with Imperial County to respond to the emergency medical service needs of ISDRA visitors.

MARKET ANALYSIS

Customer Profile

The ISDRA draws recreation visitors from major population centers including San Diego and Los Angeles in California, and Phoenix and Tucson in Arizona.

In 2000, the nine counties surrounding the ISDRA had an estimated population of 22.6 million, up from 19.3 million in 1990. This represents an increase of over 3.2 million people (17 percent) in a decade. Table 2 provides a snapshot of the current population in the nine counties as well as 20-year projections for each county. All counties except Los Angeles showed double-digit increases in population between 1990 and 2000. Imperial County's 30.2 percent

increase was second only to Riverside County's 32.0 percent increase among the six California counties. Two of the Arizona counties, Maricopa and Yuma, experienced growth rates of 44.8% and 49.7%, respectively.

The 20-year projections suggest continued growth for the nine counties. Triple digit growth is projected for Riverside, Maricopa and Imperial counties. In addition to the projected growth within Imperial County, increased population in the other counties of the study area will move population centers closer to Imperial County.

Table 2, County Population Projections Through 2020

	1990	2000	2010	2020	% Increase 1990-2000	% Increase 2000 -2020
California						
Imperial	109,303	142,361	217,500	294,200	30%	169%
Los Angeles	8,863,164	9,519,338	10,605,200	11,584,800	7.4%	31%
Orange	2,410,556	2,846,289	3,266,700	3,541,700	18%	47%
Riverside	1,170,413	1,545,387	2,159,700	2,817,600	32%	141%
San Bernardino	1,418,380	1,709,434	2,231,600	2,800,900	20%	97%
San Diego	2,498,016	2,813,833	3,288,400	3,863,500	13%	55%
Arizona						
Maricopa	2,122,101	3,072,149	3,709,566	4,516,090	45%	113%
Pima	666,880	843,746	1,031,623	1,206,244	26%	81%
Yuma	106,895	160,026	171,689	209,861	50%	80%
Study Area Total	19,365,708	22,652,563	26,781,978	34,834,895	17%	80%

No new profiling surveys have been conducted of ISDRA OHV recreationists since the 1998 Visitor Satisfaction Survey which was discussed in detail in the original CDDBP. However, to recap that data:

The typical ISDRA recreationist is a male, California resident between the ages of 18 and 30 who travels in a group, but does not belong to an OHV organization. The average group size was 16 (note that this 1998 survey utilized averages which are significantly skewed from the median). Most visitors travel three - four hours and stay overnight (typically 1 - 3 nights).

Just under fifteen percent (14.7) of ISDRA visitors are from Arizona, 0.8% from other states and 81.7% from within California. (Note that 2.8% did not complete this question in the 1998 survey.

In general, based upon consultant's interviews and on-site observations, the vast majority of Off-Highway recreationists are responsible, family-oriented (not necessarily families, but family-oriented) outdoor recreationists who partake of nature through their vehicles vis-a-vis a camera, rod, pole, hike, kayak, canoe or sailboat. As with most outdoor recreationists, they are environmentally conscious and recognize the need to "tread lightly" to ensure the continued continuity of their sport and preferred locations.

It is too easy to focus on the "machine," instead of the person, but several recreationist-types (including RVers and campers) overlap within the OHV sector. During the on-site tours, consultant saw a predominance of Recreational Vehicles (RVs, "motorhomes" in the old nomenclature), but also noticed a tremendous number of tent-campers who had towed their OHV behind a family

sedan, wagon, pick-up, or SUV and had then pitched their tent next to the vehicle. With this observation in mind, let us look at recent data related to RV owners and Campers in California.

The *RV Alliance America* conducted a camping study in 2001 that examined the changing demographics of the "typical" RV owner in light of the coming-of-age of the "baby-boomers." The authors of the article, *Camping at a Crossroads*, carried in the organization's Spring 2001 newsletter *Inches to Miles*, pointed out that "Boomers" taking weekend trips in RVs will soon outnumber retired "RVers" taking extended vacations. Their data indicate that sporting activities and youth programs are a major consideration and that RVers overall own more recreational equipment than non-RV owners. "While shopping, sightseeing and visiting family rank high for all RVers, **70% of the younger "Boomers" enjoy increased physical recreation, such as boating, swimming and motorcycling.**"

Campers in California, Travel Patterns and Economic Impacts was conducted by Dean Runyan and Associates at the behest of the California Roundtable on Recreation, the State of California Division of Parks and Tourism.

Highlights of this study reveal the following:

- making reservations "easier" to make is the top request of all campers
- more than eight of ten campers became interested in camping and spending time outdoors as children
- more than half of all campers were with parents on their first camping trip
- friends and parents were greatest influences upon

- camping interests
- campers at National Parks outspend other public campground users
- campers rely **most** on their knowledge from previous trips, but *one-fourth of respondents also use the Internet*
- the majority of campers are California residents, that take trips only within the State of California
- the majority of trips are one week or less and
- usually, within 300 miles of home
- campers are relatively affluent—more than 2/3 reporting annual incomes of \$50,000 or more
- campers are relatively well-educated
- about 1/8 of campers are non-white.

When?

The OHV Season typically runs from October through May—depending upon area-specific temperatures.

Each of the ISDRA Management Areas receives regular, weekly visitation, including mid-week, but as generally perceived, the weekends, especially holiday weekends which facilitate longer travel time to more remote destinations, such as sand dunes receive the bulk of visitations. Many, many families “OHV” for their annual vacation, thus these are extended stays which often reach the 14-consecutive-day camping limit on BLM lands, and/or encompass multiple destinations (Recreation Areas in BLM parlance).

Why?

Today's high-pressure, fast-paced lifestyle has led to another oxymoronic phrase: **POWER LEISURE**—*the tendency to work-hard and to play-hard*. While the phrase often evokes images of high-adventure and high-risk recreation, it equally applies to OHV activities which provide that same exhilarating adrenaline rush when climbing (and descending) a sand mountain at a near-vertical attitude, and when navigating whoop-de-dos along a designated trail.

In addition to the excitement of **POWER LEISURE**, Corie Stancliff, California Department of Parks and Recreation Planning Division points out the health benefits of recreation to our overweight and “over-stressed” society. Ms. Stancliff cites several studies, ranging from the Surgeon General's Report *A Call to Action to Prevent and Decrease Overweight and Obesity* to studies by the *American Cancer Society* and the *Texas Heart Institute*. According to the *Center for Disease Control*, physical recreation:

- enhances personal growth
- reduces mild and clinical depression
- builds self-esteem and self-confidence, especially in youth
- reduces tension and anxiety

Other OHV Areas

Other areas mentioned by visitors and vendors as offering a similar OHV experience to that of the ISDRA include Sand Mountain, Nevada; Little Sahara, Nevada and Coral

- encourages spiritual renewal and personal growth
- increases mental relaxation, and
- generates a sense of well-being.

COMPETITIVE REVIEW

There are over 600 public, community, county, and private recreation agencies in California—BLM coordinates with 75% of them. The major suppliers of recreation are as follows.

Federal Recreation Lands

Over 90% of the federally administered lands are managed by agencies which have a legal mandate for outdoor recreation. Most of the federal lands are underdeveloped, often in remote mountain or desert areas, providing predominately rural, water-based or back-country recreation experiences. Public lands administered by the BLM account for 32% of the federal lands in California.

There are six principal federal agencies that provide recreation opportunities. These include the U.S. Forest Service, National Park Service, Bureau of Land Management, U.S. Fish and Wildlife Service, Bureau of Reclamation, and the U.S. Army Corps of Engineers. A detailed description of each of these was provided in the original CDDBP.

State of California

California Department of Parks and Recreation

California Department of Parks and Recreation (CDPR) is the lead state agency for park and recreation programs and activities. Nine other state agencies also provide a lesser amount of recreation activities as an important by-product of their principal roles, largely associated with water resources, fish and wildlife, and fire protection.

The CDPR manages four distinct programs: 1) the State Parks System; 2) the Off-Highway Motor Vehicle Recreation Program (OHMVR); 3) local grants and financial assistance; and 4) historic preservation. Three of these programs are oriented toward offering recreation facilities and programs to the state residents.

State Vehicular Recreation Areas (SVRAs) are OHV parks that are owned and operated by the OHMVR Division of California State Parks. There are currently 7 SVRAs totaling approximately 72,000 acres and growing. They were all purchased with OHV Funds and the maintenance/staffing of each is paid with OHV Funds. The State does not provide any assistance from the State's General Fund!

The map to the right identifies the location of the following SVRAs: 1) Carnegie SVRA, 2) Hollister Hills SVRA, 3) Hungry Valley SVRA, 4) Ocotillo Wells SVRA, 5) Oceano Dunes SVRA, 6) Prairie City SVRA.



Pink, Utah, and the BLMs own Dumont Dunes.

Table 3 reflects fee pricing ranges for the above agencies.

Table 3, Fee Ranges for Agencies within Southern California Geographical Area

Agency	Entrance	Season Entrance	Use (Parking)	Season Use (Parking)	Camping (Overnight)	Season Camping (Overnight)	Online Reservation Surcharge
Bureau of Reclamation			\$ 0 - \$ 10	\$ 30	\$ 5 - \$ 14		\$ 7.50
California State Parks	\$ 0 - \$ 10		\$ 0 - \$ 30		\$ 7 - \$ 20		
California SVRAs			\$ 4	\$ 40	\$ 6		
Fish & Wildlife	\$ 10 (7 days)		\$ 4	\$ 12			
National Parks	\$ 0 - \$ 10	\$ 50	\$ 0 - \$ 30		\$ 4 - \$ 12		
USFS (SoCal: Angeles, Cleveland, Los Padres, San Bernardino)	\$ 5 - \$ 10		\$ 25 - \$ 30	\$ 30	<i>not applicable where adventure pass enforced</i>		\$ 7.50

Market Niche Matrix

The following Market Niche Matrix, Table 4, is excerpted from the original CDDBP to illustrate the diversity of recreation occurring throughout the ECFO. Recognize that while this document focuses upon OHV Recreation, there are many other recreational activities occurring throughout the ECFO and, specifically, at the OHV areas discussed in this business plan.

Table 4, Market Niche Matrix

Field Office Site Name	Accessible	Locality Characteristic			Currently Attracts					(Duration) Attractive As			Originatio n Market		Recreational Opportunities / Interest(s)															
		Destination	Corridor	Gateway	Soloists	Families	Party Crowd	Other Group(s)	Seniors	Day-Use	Single-Night	Multi-Night	Rural	Urban	Archeological/Cultural	Bird Watching	Camping	Fishing	Hunting	OHV	River	Rockhound/Gold Pan	Scenic/BC Byways	Trails				Watchable Wildlife	Wilderness	
																								Hiking/Backpacking	Horseback Riding	Mountain Biking				
El Centro Field Office																														
Buck Canyon			Y		Y	Y		Y		Y			Y			Y								Y	Y	Y				
Carrizo Gorge Wildemess			Y		Y	Y		Y	Y	Y	Y		Y				Y		Y				Y	Y				Y		
Cottonwood CG			Y		Y	Y		Y	Y	Y	Y	Y	Y	Y		Y	Y		Y				Y	Y	Y					
DeAnza Trail			Y		Y	Y		Y	Y	Y			Y	Y									Y							
Fossil Canyon			Y		Y	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y		Y		Y	Y	Y					
Hot Springs LTVA		Y							Y			Y	Y	Y			Y				Y									
Imperial Sand Dunes (OHV)		Y	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y			Y				Y	Y		
Jacumba Mountains Wilderness			Y		Y	Y		Y	Y	Y			Y	Y			Y		Y										Y	
Lark Canyon CG (OHV)			Y		Y	Y		Y	Y	Y	Y	Y	Y	Y			Y		Y	Y						Y				
Pilot Knob LTVA		Y							Y			Y	Y	Y			Y													
Tamarisk LTVA		Y							Y			Y	Y	Y			Y													
Tumco			Y		Y	Y		Y	Y	Y			Y			Y								Y						

The MARKET NICHE MATRIX should be used to develop “interest-oriented” signing, promotional and educational efforts around those sites that appeal to the same or similar niche. Initial efforts should focus on dispersing use to less dense areas as defined by your Recreational Opportunity Spectrum (ROS) analysis within the RAMP. You could also promote non-OHV opportunities, such as camping adjacent to the Wilderness Area, Mammoth Wash for a more secluded experience and change-of-pace from the sand dunes—to name just a few.

On-site signing in the Gecko and Glamis areas in particular, but also in Buttercup, Ogilby and Wash Road should be implemented as a positive encouragement to geographic dispersion to the less-frequented areas—perhaps an aerial photograph showing the less-crowded

areas on a busy, but non-holiday weekend—with a map inset showing how to get there, via sand and via roadway.

Also, add a kiosk near each vault toilet and adjacent to or within each vending area to ensure exposure—most visitors simply drive by those kiosks near an entrance because they’re “on a mission” to “stake their claim” and set-up camp.

You should also consider including a promotional image and map inset with contact info for Ocotillo Wells—especially near the Self-Pay machines—as a service to those visitors who do not want to pay the BLM use fee.



California Trends for Outdoor Recreation

This page is excerpted from our original CDDBP in 1999 because it still holds true today—only stronger. The survey is conducted every five years, but the 2002 results will not be available until later this year (2003). Preliminary discussions indicate similar results to the 1997 survey.

“Californians’ attitudes towards the importance of recreation have not changed since 1987. However, their

preference for type of outdoor recreation area has changed.

As Table 5 indicates, Californians now prefer natural and undeveloped areas over nature-oriented parks and recreation areas by 10 points. During the same time period, interest in highly-developed areas, historical and cultural sites, and private outdoor recreation areas has actually decreased.

Table 5, Preferred Type of Outdoor Recreation Area, California State Parks

	1987	1992	1997
Natural and undeveloped areas	26.5%	41.8%	39.4%
Nature-oriented parks and recreation areas	29.2%	26.3%	30.0%
Highly developed parks and recreation areas	21.1%	14.2%	10.2%
Historical or cultural buildings, sites or areas	9.3%	7.1%	9.3%
Private, not public, outdoor recreation areas	9.8%	10.6%	11.1%

“The California State Parks study also indicates that “Activity patterns have changed since 1987. General nature study and cross-country skiing have steadily increased. Off-highway use of 4-wheel drive vehicles dropped in 1992, and then climbed back to 1987 levels in 1997. Use of motorcycles and ATVs was about the same between 1987 and 1992, but increased by about 30 percent in 1997. Bicycling has increased about 10 percent since 1992, but mountain biking off paved surfaces decreased from an average of about 28 to 21 days per year.

“Several activities exhibited growth 1992 and then declined to about the 1987 levels. Activities in this category include walking; camping in developed sites; camping in primitive areas; picnicking in developed sites; kayaking, rowboating, canoeing, and rafting; saltwater and fresh water fishing. Among participants, slight decreases are evident in the number of days camped, both for developed and primitive camping. For both types of camping, the average number for participation days dropped about 20% between 1992 and 1997.”

In reviewing the raw data, it is clear that recreation

activity peaked in 1992 and then decreased in 1997 to about the 1987 levels. Several explanations for this anomaly have been offered, from demographic changes in age, gender, income, and Ethnicity. While each of these demographic changes would obviously have some impact upon usage patterns, we believe the main impact is the result of less “disposable-time” among residents.

The National Survey on Recreation and the Environment (NSRE) was conducted in 1982 and 1994. It focused upon trends in recreation activities at the national level. Since 1982 the nation’s population has increased by about 13 percent. During this time, nearly all surveyed-activities increased as well. The NSRE report highlighted that for most activities, participation is lower for people with family incomes less than \$25,000 per annum, and also lower for households with incomes above \$100,000.

The more recent survey (1996) conducted by Roper Starch Worldwide with the American Recreation Coalition determined that Americans are streamlining their recreational activities—from an average of 4 activities in 1995 to an average 3.3 activities in 1996.

PRICING STRATEGY

Federal appropriated recreation funds are not currently, and have not in recent history, been sufficient to provide base operations and maintenance.

As stated twice in the introductory section, the principal motivation to this particular fee analysis is the realization that OHV Trust Fund Grants will no longer be available to fund the ongoing operations and maintenance (law enforcement, EMS, communications, site improvements, etc) necessary to operate OHV Open Areas in the safe and responsible manner required by law. Initially, this was an educated guess based upon downward trends in grant awards vis-a-vis previous year awards, and the observation that \$25 million in applications were made for the fiscal 2003 funding cycle, while only \$16 million in Grant Funds were available. This expectation is now a documented fact with the passage of AB2274.

Current funding will not sustain current levels of service. If all funding sources are exhausted and funding needs have not been met, the BLM will not operate in deficit—services will be discontinued either permanently, or temporarily until funding is made available. **Therefore, the BLM intends to develop a more focused and self-sufficient Use Fee strategy to reduce dependency upon these now unpredictable—and shrinking grant funds.** However, BLM will continue to pursue grant funds, but they will be used to provide project- and task-oriented on-the-ground services; not to supplement base operations and maintenance.

BLM Fee Policies

The original concept for the California Desert Recreation Fee Demonstration came from a series of meetings that focused on recreation fees in the California Desert. These meetings involved politically appointed members, interested user groups and individuals, and six members of the then seated DAC (Desert Advisory Council). The user groups and individuals represented many facets of the recreation community including the off-highway vehicle and environmental constituency. Working together, these diverse people developed a set of guiding principles for implementation of any recreation fee program and developed a thumbnail sketch of a larger strategy that included the establishment of a California Desert outdoor recreation association (to create revenue and provide support to BLM management and education programs). The following guiding policies were established for **Fee Demo** sites:

- There will be one account for each BLM Field Office and 100% of the fees collected will be deposited using this account.
- 100% of the fees collected will be available for use by the BLM at the site(s) where the fees were collected.
- Funds will be used to pay for operation, maintenance, and improvements to enhance recreation opportunities and visitor experiences.
- General government overhead (equipment, supplies, rents, salaries for line management, etc.) is not to be charged against these new collections. The collected funds are to be in addition to the normal funding for these sites.
- There should be no offsets in appropriated funding.

Public Acceptance of Fees

While no one likes fees, and all of us enjoy a *free ride*, the public, in general, and **the vast majority** of Off-Highway recreationists who responded to the BLM's Dumont Dunes survey, as well as the majority of the individuals

interviewed by this consultant **support fees to maintain access IF** they are:

- fair,
- affordable,
- reinvested in the site from which they are collected, and
- efficiently administered.

The only obvious and vocal complaint received from ISDRA visitors is the lack of tangible, on-the-ground improvements after three seasons of the fee. In personal meetings with visitors, once the financial situation is explained (i.e. decreased OHV Trust Fund Grants, expenditures related to the Zero-Tolerance Law Enforcement policy on holiday weekends, and expenditures related to the CBD lawsuit) the complaints turn to feelings of betrayal by the OHV Trust Fund Commission; suggestions to not enforce the Green Sticker on federal lands that do not receive Green Sticker monies, but to increase the ISDRA fee by the Green Sticker amount; and eventually, a reluctant desire to “do what we have to do to keep the public OHV lands open to the public.” (In keeping with the preceding four caveats).

Pricing

Pricing is as much an acrobatic art as a science; it requires appropriate balancing of costs, customer attitudes, and competition to maximize net income to the organization. There are many ways to price what you offer. In the private sector, for example: *demand pricing*, where a higher price is set for a smaller level of demand, and vice versa; *cost-plus*, where all fixed and variable costs are covered and a percentage profit is added; *markup pricing*, used mainly in retailing; and *competitive pricing* used in competitive fields where products are not easily differentiated, to name a few.

The BLM, however, is NOT driven by specific profit margin objectives as are private sector businesses, but it must attempt to at least breakeven on recreational expenditures no longer funded through OHV Trust Fund Grants, and it must consider the prices charged by other recreation providers. This project is primarily concerned with **cost-recovery to ensure that the OHV Recreation Areas remain open to the public.** A Fair Market Value (FMV) analysis was conducted to ensure that resulting prices were within a competitive and fair market range.

Visitation

Accurate visitation information is critical to establishing a cost-recovery fee. While the concept is obvious, it is often overlooked as a budgeting priority. The visitation counts since 1995 have fluctuated wildly with some of the fluctuations explained by shifts in the economy, and others by natural or terrorist disasters that temporarily shift travel patterns, but many of the fluctuations are not explained at all. Therefore, it is imperative that accurate, programmable vehicle counters be installed at all major routes of ingress and egress to each recreation area. Only with accurate vehicular counts can an accurate compliance rate be determined, and only with an accurate compliance rate can a true, cost-recovery fee rate be determined.

Not only have visitation levels varied greatly from year-to-year, but they especially vary from season-to-season and from weekend-to-weekend—from almost zero in the summer to approximately 200,000 on Thanksgiving weekend. Current staff are stretched to their limit to successfully manage the ISDRA on regular weekends. On the six holiday weekends that account for half of the entire visitation for the season, BLM has been contracting for

extra Law Enforcement Officers from other agencies throughout the nation. However, funding for this \$2.34 million per annum contracted workforce is no longer available. Therefore, the ensuing Fee Analysis Spreadsheet examines ways to recover these costs without making visitation cost-prohibitive for the average recreationist.

Specifically, the RAMP calls for “holiday weekends to be staffed as listed below, with the primary goal of modifying the current behavior patterns using the incident command system and decreasing the number of law enforcement officers as behavior patterns improve:

Table 6, ISDRA Holiday Public Safety Staffing	
Holiday	LEO & EMS Staff
Halloween	75 - 125
Thanksgiving	150 - 200
New Year	75 - 100
Martin Luther King	50 - 75
Presidents Day	100 - 150
Easter	50 - 100

Volume / Capacity

Directly related to Visitation and Pricing is the concept of Volume. A private sector business attempts to maximize profit through a better (cheaper) price than their competition that increases its market share relative to the competition. That is 100 widgets at \$5 each generates more revenue and net profit than 10 widgets at \$10 each. However, in the private sector, costs of production typically decrease with volume, and even service industries realize some “economy of scale” through shared equipment and administrative costs.

The BLM situation is the reverse. As grossly demonstrated at the ISDRA and as is beginning to be experienced on a smaller scale at the Barstow Field Office’s Dumont Dunes, an increased customer base reaches a critical mass that suddenly requires a tremendous investment of resources to ensure public safety and to corral lawlessness. Therefore, instead of encouraging aggressive marketing as discussed in the original CDDBP, the ISDRA and Dumont Dunes should focus on distributing their visitation patterns throughout the season to balance the demand for public safety services; thereby, leveling off the extreme fluctuations which necessitate expensive, external contracted labor.

Several recreationists expressed concern that this “smacked of capacity limits,” as though that was a bad thing. As with most controversial issues, perspective makes a huge difference. If “capacities” are looked upon as limiting our traditional freedoms, such as the right to assembly, then yes, they are “bad.” However, if such capacities are approached from a public safety point of view, such as a fire marshal’s determination that only a fixed number of people may safely congregate in a certain sized and equipped building, then capacities are “good.”

Whether or not a person agrees with the thought-process, certain carrying capacities (as defined by Recreational Opportunity Spectrum definitions, and perceived potential impacts upon certain plants and animals), have been determined that would eventually trigger OHV Open Area closures. The process is in place as part of the negotiated settlement agreement and resultant RAMP (Recreational Area Management Plan).

In reality, BLM staff are trying to remain proactive and instead of actually enforcing capacity limits, they are attempting to use pricing as a mechanism to maintain the areas as open and affordable to the general public, while at the same time addressing the exceptional costs associated with the six major holiday weekends.

For a private sector analogy, consider Disneyland’s seasonal winter discount to southern California residents. Through differential pricing they are encouraging a more even distribution of visitors throughout the year. So the BLM, through differential pricing is encouraging temporal dispersion which will hopefully, decrease overall operating costs and keep the cost-recovery passes affordable and fair. However, for those recreationists who insist, or perhaps can only come out on the six major holiday weekends, the differential pricing will responsibly recover the extra costs associated with those weekends vis-a-vis averaging them into the entire budget and making everyone pay for them—effectively doubling or tripling the non-holiday Use Fee.

Interchangeable Passes

Dumont / Glamis

Many dune recreationists have indicated a desire to have the ability to pay one fee that would give access to both the Dumont Dunes and the ISDRA—a concept similar to the **National Parks Pass** and the **Golden Eagle Pass**. However, these two example passes **only cover entrance fees**, not use fees. For example, the \$50 National Park Pass would enable a visitor to enter Death Valley National Park without paying the \$10 Entrance Fee, but to spend the night, would still cost \$12 per night. **The BLM has chosen to NOT CHARGE ENTRANCE FEES, but rather to charge ONLY USE FEES.**

The concept of a Dumont / Glamis interchangeable pass was considered by the El Centro and Barstow Field Offices from two different implementation strategies:

- 1) total reciprocity (i.e. all passes are interchangeable),
- 2) separate passes that would be interchangeable at each site.

Both of these have merits from a service perspective, but both were rejected for because:

- Each area has its own funding needs, interchangeable passes would need to be more expensive than single area passes to provide necessary funding for each area.
- If all passes were interchangeable, all visitors would ultimately be paying for the management of both areas. While the two areas share many visitors, the vast majority visit only one of the two areas. This would mean that visitors that only recreate at the ISDRA would be paying for the management of the Dumont Dunes and vice versa.
- The higher price of the interchangeable passes would negate much of the value of such a pass.
- A principle concern of the congress and the public in regard to the fee demo program is the accountability of the use of funds generated through the fee demo program. Interchangeable passes would add greatly to the complexity of this accountability—likely leading to ill feelings and a general lack of trust in the programs.
- Current BLM accounting and facilities management systems cannot accommodate such a creative product.

Second Vehicles

Many ISDRA recreationists have suggested a discounted “additional” pass for multiple vehicles within the same

family. While this consultant appreciates the concept from a customer service and convenience point of view, actual implementation is currently cost-prohibitive.

We reviewed the USFS Adventure Pass program which does offer a second season pass for \$5 once the first is purchased at \$30. However, three issues make such a pass unfeasible for the BLM at this time:

- **Administration** - The USFS requires in-person presentation of vehicle ownership and drivers licenses. The increased administrative costs and increased inconvenience to customers is obvious. Perhaps not so obvious, is the resultant enforcement costs; how much more time will be required of the LEOs to verify that each pass is on the correct car—at least the correct “family” of cars?

At best, such an “additional” pass would actually cost more than the normal pass—redesign and separate printing of the pass to include some form of vehicular identification, increased paperwork and staff time to administer, and increased enforcement costs (i.e. verification).

- **Fraud** - More importantly, the majority of the ISDRA clientele have demonstrated that they will not comply with fee requirements unless they are forced to do so. Such an additional, discounted pass, without an airtight enforcement methodology would lead to even less actual compliance as multiple visitors would purchase two passes either then share the second with friends and family, or split the combined cost. This happens on a regular basis with the USFS Adventure Pass.

Further, external vendors who currently sell USFS Adventure Passes do not even attempt to verify vehicle ownership—thereby “cheating” the few visitors who do voluntarily comply, and ultimately leading to reduced compliance and a sense of “unfairness.”

Finally, the USFS simply attempts to make as much money as possible and to spend whatever Washington sends back to them on-site. The USFS can do this

because their Washington appropriations range from \$8-\$10 per acre; whereas, Washington only appropriates approximately \$4 per acre to the BLM.

- Also juxtaposed to the USFS, the BLM El Centro Field Office has committed to a **cost-recovery pricing** strategy that is completely dependent upon the number of passes sold. ***This business plan bases the pricing recommendation upon the total vehicle-visits to the ISDRA during the past season. Vehicle counters do NOT differentiate between “same-family” vehicles and “unrelated” vehicles; therefore, there is no realistic method to estimate the impact of, nor to increase the price of the normal pass to compensate for the number of “same-family, multiple vehicles.” Even if the actual numbers of such vehicles were known, any aggregate discount would have to be added to the cost of the initial permit; therefore, resulting in the same total cost for each family.***

We hate to bring it up, but from a political, socio-economic point of view, with the current, limited, visitation data such a discounted multiple vehicle pass would actually imply that the more efficient/organized visitors would be subsidizing the less efficient/less organized visitors.

For these reasons, we cannot recommend a “second” pass at a discounted rate for the 2004 visitor season. However, personnel at the entrance/exit checkpoints and all vendors could certainly conduct an informal count of the number of such vehicles and requests, and solicit suggestions from recreationists during the 2004 season.

Staff and the TRT should review the number of requests and the various suggestions through the New Year’s weekend and then utilize focus groups during the remainder of the season to determine need, appropriateness and methodology for the 2005 visitor season.

Visitation Statistics with Projections

# of Visits in OHV Areas - 1995 - 2002 Source: BLM RMIS Data Tables										Projected (19.61% Annual Growth)	
	1995	1996	1997	1998	1999	2000	2001	2002*	2003	2004	2005
Total Visitors	416,065	432,707	508,581	665,163	776,614	867,753	656,451	1,416,018	1,200,000	1,435,320	1,716,786
Vehicles (Visitors ÷ 3.5)	118,876	123,631	145,309	190,047	221,890	247,929	187,557	404,577	342,857	410,091	490,510
Change from Previous		4.00%	17.53%	30.79%	16.76%	11.74%	-24.35%	115.71%	-15.26%		
Ave Change '95-'03									19.61%		

* Underground vehicle counters were installed at each major entrance point prior to the 2002 Visitor Season; therefore, this significant jump is attributed to real-time, everyday counts instead of just to those weekends with a staff presence and random fly-over estimates which were previously extrapolated to year-round totals. 2003 is also based upon the vehicle counter counts.

² We have also reduced the actual counts by 1/3 because of on-the-ground estimates regarding multiple trips by recreationists, vendors and BLM staff.

Cost-Recovery / Breakeven Analysis

Table 7 reflects the expenses incurred to operate the ISDRA, anticipated revenues from congressional appropriations and grants, and the remaining shortfall/loss. The cost-recovery / breakeven analysis determines the necessary price to charge to recover this shortfall at various compliance rates..

“Where do you get the underlying number? We understand the relationship between the alternatives—the change affected by increased compliance, but how was the base number derived?”

The simple answer is to show the formula, but, of course, that does not communicate the meaning behind

it; therefore, we will attempt to explain it in “plain English.” We will discuss the first section of the spreadsheet which projects 26% compliance.

- 1) Last year 70,855 passes were purchased. This represents 26% of the 2003 adjusted vehicle count of 268,984. “Adjusted count” simply meaning visitor vehicles and BLM staff vehicles that make multiple trips into and out of the ISDRA. On-the-ground observations indicate that about one-third (1/3) of the total counts are extra trips made by vehicles that have already been counted. Therefore, 268,984 represents two-thirds (67%) of the total count. This breaks out to 82,463 vehicles on the six holiday weekends and 186,521 vehicles on the non-holiday weekends.
- 2) Of the 70,855 passes sold last year, 14,880 (21%) were season passes and 55,975 (79%) were weekly passes.
- 3) For the 2004 cost-recovery calculations, we projected a 10% increase in visitation. The average increase since 1995 has been 12.53%, but this also fluctuates up AND down; therefore, we chose 10% to recognize growth, but to remain conservative.
- 4) We also anticipate temporal displacement from holiday weekends to non-holiday weekends of 20%. This is based upon the 24.35% decrease during the 2001 visitor season when fees were first *enforced* at the ISDRA, and the fact that Dumont Dunes, which gained an influx of visitors at that time, is now charging fees.
- 5) Thus, the gross projected vehicles utilized within the cost-recovery formulas is 2003 visitation, plus 10% growth. The holiday projected vehicle count is 2003 holiday vehicles, plus 10% growth, minus 20% (shift to non-holiday periods) of the 2003 holiday vehicles. The non-holiday projected vehicle count is 2003 non-holiday vehicles, plus 10% growth, plus 20% (shift to non-holiday periods) of the 2003 holiday vehicles.
- 6) Permit Distribution Costs of 15% represent a combination of user group, vendor, and self-pay

machine discounts. The same rate is applied to BLM direct sales to account for postage, supplies, telephone, and credit card discount rates associated with fulfilling online, direct mail and telephonic purchases.

- 7) RAMP capital improvements are “assumed” to be paid for out of non-fee revenues and are, therefore, not included in the fee calculation.
- 8) *Please note that we are using the brackets symbols “{}” within the following formula to surround explanatory comments, not to indicate mathematical operations.* The formula for the ALL-Holiday, ALL-Season Pass that costs two times the 7-Day Holiday Pass {2X weekly pass}, is the same as the formula for a 7-Day Pass that costs ½ times ALL Season Pass {weekly pass = .5X season pass}. Thus, the formula for an ALL Season Pass that costs two times {2X weekly = .5X season} as much as a 7-Day Holiday Pass, at a 26% compliance rate looks like this:

$$\text{SHORTFALL/LOSS} \div ([\text{vehicles} \times .26 \{\text{compliance rate}\} \times .21 \{\text{season pass share}\}] + [\text{vehicles} \times .26 \{\text{compliance rate}\} \times .79 \{\text{weekly pass share}\} \times .5 \{\text{ratio of weekly pass price to season pass price}\}])$$

Recommendation

As is evident from the following tables, we have presented a range of cost-recovery prices. Our recommendations are shaded and surrounded with a hairline border. We recommend that the Non-Holiday, 7-Day Pass price be based upon a 41% compliance rate because these are the periods that currently have the lowest compliance rate (less than 26%), whereas we recommend that the Holiday Pass and the ALL-Season pass be based upon a 50% because the Holiday periods currently have the highest compliance rate and purchasers of season passes will likely be attending during Holiday as well as Non-Holiday periods.

Table 7, Cost-Recovery/Breakeven Analysis - ALL Vehicles

Row	Vehicle Counts			Vehicles
1	Holiday Vehicles	# Vehicles	% of Total	
2	Halloween	21,243	17%	
3	Thanksgiving	47,620	39%	
4	New Years	14,787	12%	
5	MLK	11,323	9%	
6	Presidents	17,086	14%	
7	Easter	11,020	9%	
8	Total Holiday Vehicles	123,079	100%	
9	Less 1/3 "double-count"	-40,616	(Based upon BLM draft study results)	
10	Net Holiday Vehicles	82,463		82,463
11				
12	Non-Holiday Vehicles	278,390		
13	Less 1/3 "double-count"	-91,869		
14	Net NON-Holiday Vehicles	186,521		186,521
15				
16	Adjusted Total Vehicles 2003		2003 Permits	
17	Overall Percent Compliance		70,855	268,984
18	2004 10% Increase		26%	26,898
19	Total Projected 2004 Vehicles			295,883
20				
21	EXPENSES			
22	Annual BUDGET (Row 33, Table 10)			\$ (5,133,991)
23				
24	INCOME			
25	Appropriations			\$ 200,000
26	Grant(s)*			\$ 0
27	Vendor Permits			\$ 98,100
28	TOTAL INCOME			\$ 298,100
29				
30	Shortfall / Loss (Row 22 - Row 28)			\$ (4,835,891)
31	Permit Distribution Costs	15%		\$ (725,384)
32				
33	Gross Shortfall / Loss			\$ (5,561,275)
34	Contingency	10%		\$ (556,127)
35				
36	NET SHORTFALL / LOSS			\$ (6,117,402)
37				
38		Compliance	Season Pass	yields a 7-Day Pass*
39	Break-even @ Existing # Permits (70,855)			
40	Season Pass @ 4X Weekly Pass	26%	\$ 177	\$ 44
41	Season Pass @ 3X Weekly Pass	26%	\$ 154	\$ 51
42	Season Pass @ 2X Weekly Pass	26%	\$ 119	\$ 60
43				
44	Break-even @ 41% Compliance (41% assumes 5 repeat visits by season pass holders)			
45	Season Pass @ 4X Weekly Pass	41%	\$ 112	\$ 28
46	Season Pass @ 3X Weekly Pass	41%	\$ 97	\$ 32
47	Season Pass @ 2X Weekly Pass	41%	\$ 76	\$ 38
48				
49	Break-even @ 50% compliance			
50	Season Pass @ 4X Weekly Pass	50%	\$ 92	\$ 23
51	Season Pass @ 3X Weekly Pass	50%	\$ 80	\$ 26
52	Season Pass @ 2X Weekly Pass	50%	\$ 62	\$ 31
53				
54	Break-even @ 60% compliance			
55	Season Pass @ 4X Weekly Pass	60%	\$ 77	\$ 19
56	Season Pass @ 3X Weekly Pass	60%	\$ 67	\$ 22
57	Season Pass @ 2X Weekly Pass	60%	\$ 52	\$ 26

* Due to the uncertainty of OHMVR Trust Fund Grants and the contentious climate in the ISDRA, such volatile funding cannot be depended upon for ongoing, recurring O&M costs; therefore, we have budgeted zero (0) grant income for fee calculation. Note also that the RAMP states base funding will come from appropriations, while any grant funding will be used for expenditures over-and-above normal operations and maintenance.

Table 8, Cost-Recovery/Breakeven Analysis - NON-Holiday Vehicles

Row	Vehicle Counts			Totals
1	Non-Holiday Vehicles	278,390		
2	Less 1/3 "double-count"	-91,869	(Based upon employee on-the-ground observations)	
3	Net NON-Holiday Vehicles	186,521		186,521
4	2004 10% Increase			18,652
5	20% Shift From Holiday Weekends			16,493
6	Total Projected 2004 NON-HOLIDAY Vehicles			221,666
7				
8	EXPENSES			
9				
10	BUDGET (Row 30, Table 7)			\$ 4,835,891
11	Less Holiday Law Enforcement & EMS (Row 11, Table 10)			\$ (2,340,000)
12	TOTAL ON-GOING EXPENSES			\$ 2,495,891
13	Reduced by Holiday Share (36 of 240 days)	15%	x \$ 2,495,891	\$ (374,384)
14				
15	TOTAL NET Non-Holiday ISDRA Expenses			\$ 2,121,507
16	Permit Distribution Costs (15%)	15%		\$ 318,226
17				
18	Net Shortfall / Loss			\$ 2,439,733
19	Contingency (10%)	10%		\$ 243,973
20				
21	GROSS SHORTFALL / LOSS			\$ 2,683,707
22				
23		Compliance	7-Day Pass	
24	Break-even @ Existing # Permits (70,855)	26%	\$	47
25	Break-even @ 41% Compliance	41%	\$	30
26	Break-even @ 50% compliance	50%	\$	24
27	Break-even @ 60% compliance	60%	\$	20

* Due to the uncertainty of OHMVR Trust Fund Grants and the contentious climate in the ISDRA, such volatile funding cannot be depended upon for ongoing, recurring O&M costs; therefore, we have budgeted zero (0) grant income for fee calculation. Note also that the RAMP states base funding will come from appropriations, while any grant funding will be used for expenditures over-and-above normal operations and maintenance.

Table 9, Cost-Recovery/Breakeven Analysis - HOLIDAY Vehicles

Row	Holiday Vehicle Counts	# Vehicles	% of Total	# Permits	Vehicles
1	Halloween	21,243	17%		
2	Thanksgiving	47,620	39%		
3	New Years	14,787	12%		
4	MLK	11,323	9%		
5	Presidents	17,086	14%		
6	Easter	11,020	9%		
7	Total Holiday Vehicles	123,079	100%		
8	Less 1/3 "double-count"	-40,616	(Based upon employee on-the-ground observations)		
9	Net Holiday Vehicles	82,463			82,463
10	2004 10% Increase				8,246
11	20% Shift To Non-Holiday Weekends				-16,493
12	Total Projected 2004 HOLIDAY Vehicles				74,217
13					
14	HOLIDAY EXPENSES				
15					
16	Holiday Public Safety Services Expense (Row 11, Table 10)				\$ 2,340,000
17	Share of ON-GOING Expenses (36 of 240 days)		15%	x \$ 2,495,891	\$ 374,384
18					
19	Total Holiday Expenses				\$ 2,714,384
20	Permit Distribution Costs (15%)		15%		\$ 407,158
21					
22	Net Shortfall / Loss				\$ 3,121,541
23	Contingency (10%)		10%		\$ 312,154
24					
25	GROSS SHORTFALL / LOSS				\$ 3,433,695
26					
27		Compliance	Season Pass	<i>yields</i>	Holiday Week Pass
28	Break-even @ Existing # Permits (70,855)				
29	Season Pass @ 4X Weekly Pass	26%	\$ 397		\$ 99
30	Season Pass @ 3X Weekly Pass	26%	\$ 344		\$ 113
31	Season Pass @ 2X Weekly Pass	26%	\$ 267		\$ 134
32					
33	Break-even @ 41% Compliance (41% assumes 5 repeat visits by season pass holders)				
34	Season Pass @ 4X Weekly Pass	41%	\$ 252		\$ 63
35	Season Pass @ 3X Weekly Pass	41%	\$ 218		\$ 72
36	Season Pass @ 2X Weekly Pass	41%	\$ 170		\$ 85
37					
38	Break-even @ 50% compliance				
39	Season Pass @ 4X Weekly Pass	50%	\$ 206		\$ 52
40	Season Pass @ 3X Weekly Pass	50%	\$ 179		\$ 59
41	Season Pass @ 2X Weekly Pass	50%	\$ 139		\$ 70
42					
43	Break-even @ 60% compliance				
44	Season Pass @ 4X Weekly Pass	60%	\$ 172		\$ 43
45	Season Pass @ 3X Weekly Pass	60%	\$ 149		\$ 49
46	Season Pass @ 2X Weekly Pass	60%	\$ 116		\$ 58

Table 10, RAMP Action Items Included in Fee Calculation

Row	Priority	Action Number	Year	Planned Action(s)	Estimated Cost to Implement	Estimated Annual Cost	Fee Calculation	Proposed Funding Source
1	A	AM #1	2003	Develop, implement, sign, monitor, enforce and revise permit program for OHV recreation	\$ 33,000	\$ 10,000	\$ 10,000	fees
2	A	AM #2	2003	Develop educational program for motorized permit program	\$ 2,600	\$ 2,600	\$ 2,600	fees
3	A	AW #11	2004	Implement the biological monitoring plan for plant species	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	federal, fees, grants
4	A	AW #14	2003	Increase staffing to include a monitoring coordinator	\$ 100,000	\$ 100,000	\$ 100,000	federal, fees
5	A	AW #18	2003	Utilize the Internet for both national and international outreach.	\$ 1,300	\$ 1,300	\$ 1,300	federal
6	A	AW #2	2003	Update fee business plan	\$ 15,000	\$ 0	\$ 0	federal, fees
7	A	AW #21	2004	All significant commercial activities will be monitored by the BLM.	\$ 11,000	\$ 11,000	\$ 11,000	federal, fees
8	A	AW #24	2004	Radio communication maintenance	\$ 46,200	\$ 46,200	\$ 46,200	federal, fees
9	A	AW #26	2004	Volunteer Support Staffing / Emergency Medical Staffing/Supervisory Engineer Position	\$ 280,000	\$ 280,000	\$ 280,000	federal, grant, and fees
10	A	AW #27a	2004	Law Enforcement Staffing - permanent	\$ 500,000	\$ 500,000	\$ 500,000	federal, grant, and fees
11	A	AW #27b	2004	Additional holiday	\$ 2,340,000	\$ 2,340,000	\$ 2,340,000	federal, grant, and fees
12	A	AW #32	2003	Dust control treatment	\$ 35,000	\$ 35,000	\$ 35,000	grant, fees
13	A	BM #4	2006	Designate an interpretive area adjacent to Greys Well Road	\$ 260,000	\$ 13,000	\$ 13,000	federal, fees
14	A	BM #8	2006	Designate a bus parking area on Greys Well Road.	\$ 6,500	\$ 325	\$ 325	federal, fees
15	A	GLM #2	2003	Camping East of Glamis - signing	\$ 2,600	\$ 500	\$ 2,600	federal, fees
16	A	GLM #3	2003	Regular Grading of the Wash Road	\$ 2,100	\$ 300	\$ 2,100	fees
17	A	O&M #1	2004	Vehicles for patrol, rescue, monitoring, maintenance,etc	\$ 100,000	\$ 100,000	\$ 100,000	fees
18	A	O&M #2	2004	Trash contract	\$ 235,000	\$ 235,000	\$ 235,000	fees
19	A	O&M #3	2004	Porta Potties	\$ 60,000	\$ 60,000	\$ 60,000	fees
20	A	O&M #4	2004	Toilet Cleaning	\$ 35,000	\$ 35,000	\$ 35,000	fees
21	A	O&M #5	2004	Toilet pumping	\$ 35,000	\$ 35,000	\$ 35,000	fees
22	A	O&M #6	2004	Resident Trailer rental	\$ 12,000	\$ 12,000	\$ 12,000	fees
23	A	O&M #8	2004	Medical Supplies	\$ 15,000	\$ 15,000	\$ 15,000	fees
24	B	AW #10b	2005	Maintenance Equipment (\$1.5mm amortized over 7 years, but expect 20-year	\$ 1,500,000	\$ 500,000	\$ 214,286	federal, fees
25	B	AW #35	2004	Enforce speed limits	\$ 650	\$ 500	\$ 500	grant, fees
26	B	GM #1	2007	Increase the amount of camping pad space on Gecko Road by 15 acres. (3 acres/pad; 1 pad every three [3] years)	\$ 499,200	\$ 19,500	\$ 33,280	grant, fees
27	B	GM #2	2004	Continue the use of volunteer and nonprofit clean-up efforts.	\$ 6,500	\$ 6,500	\$ 6,500	grant, fees
28	B	NA #4	2004	Boundary Signing	\$ 5,000	\$ 2,000	\$ 2,000	federal, fees
29	B	O&M #7	2004	Signing replacement and maintenance materials	\$ 15,000	\$ 7,500	\$ 7,500	fees
30	C	DM #1	2008	Construct pit toilets (per toilet)	\$ 16,900	\$ 16,900	\$ 16,900	grant, fees
31	C	GLM #1	2007	Construct Pit Toilets (per toilet)	\$ 16,900	\$ 16,900	\$ 16,900	grant, fees
32								
33	On-going, Annualized Total				\$ 7,187,450	\$ 4,878,625	\$ 5,133,991	Inserted into Row 22, Table 7

Table 11, Remaining RAMP Action Items NOT Included in Fee Calculation

Row	Priority	Action Number	Year	Planned Action(s)	Estimated Cost to Implement	Estimated Annual Cost	Proposed Funding Source
1	B	AW #10a	2005	Maintenance workers for the care of the ISDRA facilities and necessary equipment (labor costs)	\$ 215,000	\$ 215,000	federal, fees
2	B	AW #9	2009	Trash collection stations	\$ 1,171,300	\$ 58,500	fees, grant
3	B	BM #2	2009	Construct a semi- permanent ranger station in Buttercup	\$ 500,000	\$ 25,000	federal, grant, fees
4	B	BM #3	2009	Construct a separate semi-permanent interagency Law Enforcement	\$ 500,000	\$ 25,000	federal, grant, fees
5	B	AW #8	2009	Replace and retrofit facilities for ADA.	\$ 525,200		fees, grant, federal,
6	C	NA #5	2003	Maintain the watchable wildlife site on the eastern boundary as a nature interpretive area.	\$ 325	\$ 325	federal, grant
7	C	AW #19	2003	ISDRA Jr. Ranger Program	\$ 5,850	\$ 5,850	fees, federal
8	C	NA #3	2004	Wildlife Guzzler Maintenance	\$ 6,500	\$ 6,500	federal
9	C	NA #7	2004	The kiosk at the watchable wildlife site will include information on desert safety for hikers or equestrian visitors who venture into the wilderness	\$ 910	\$ 910	federal
10	C	AW #15	2004	Work with others for education	\$ 26,000	\$ 26,000	federal, fees
11	C	MM #1	2004	Wildlife Guzzler Maintenance	\$ 3,900	\$ 3,900	federal
12	C	DM #2	2004	Grade entrance road	\$ 1,378	\$ 1,378	fees
13	C	AW #17	2004	Outreach	\$ 26,000	\$ 26,000	federal, fees
14	C	AW #7	2004	Develop and advertise free use days program	\$ 2,000	\$ 2,000	fees, grants
15	C	BM #7	2005	Work cooperatively with the Border Patrol on a brochure that interprets the dangers of the border area and illegal border crossings on OHVs	\$ 10,000	\$ 3,900	federal, fees
16	C	AW #22	2005	The price structure for vending in the ISDRA will be independently reviewed every two years.	\$ 11,000	\$ 5,500	federal, fees
17	C	AW #25	2005	Dispatching at Cahuilla Ranger Station by Park Rangers	\$ 26,000	\$ 26,000	grant, fees
18	C	AW #16	2006	"Quick Facts" brochures	\$ 8,840	\$ 8,840	federal, fees
19	C	BM #5	2007	Repair the fencing around the plank road	\$ 130,000	\$ 19,500	federal, fees, grants
20	C	AW #20	2007	Establish volunteer host program	\$ 26,000	\$ 26,000	fees, grant
21	C	GM #15	2007	Increase contracted EMS services	\$ 46,800	\$ 46,800	Imperial County, grant, fees
22	C	BM #6	2007	Repair and update all plank road exhibits	\$ 65,000	\$ 9,750	federal, fees, grants
23	C		2008	annual pumping (per toilet)	\$ 1,100	\$ 1,100	grant, fees
24	C		2008	Annual Cleaning (per toilet)	\$ 1,430	\$ 1,430	grant, fees
25	C	GM #13	2008	Install outdoor information and interpretation kiosks and panels at Osborne Overlook. (\$325/panel; \$910/kiosk)	\$ 910	\$ 910	federal, grant, fees
26	C	GM #8	2009	Construct maintenance shed current ranger station.	\$ 633,100	\$ 31,200	federal, grant, fees
27	C	GM #9	2009	Construct a fuel station at the current ranger station for BLM use.	\$ 125,000	\$ 1,300	federal, grant, fees

Row	Priority	Action Number	Year	Planned Action(s)	Estimated Cost to Implement	Estimated Annual Cost	Proposed Funding Source
28	C	GM #12	2009	Construct additional housing and parking facilities for the ISDRA staff at the site of the current ranger station.	\$ 1,020,500	\$ 51,025	federal, grant, fees
29	C	GM #10	2009	Replace the current EMT and L.E. trailers with permanent housing.	\$ 900,900	\$ 32,500	federal, grant, fees
30	C	GM #11	2009	Remove the current ranger station trailer.	\$ 65,000		federal, grant, fees
31	C	GM #3	2009	Develop a pilot reservation program in Roadrunner Campground	\$ 82,225	\$ 75,725	grant, fees
32	C	GM #6	2009	Construct a new ranger station Cahuilla	\$ 2,655,900	\$ 132,600	federal, grant, fees
33	C	GM #7	2009	Construct an interagency Law Enforcement facility at Cahuilla	\$ 692,900	\$ 35,100	federal, grant, fees
34	T	BM #1	Trig AW#1 or GM#5	Designate campsites if deemed feasible by the pilot program	\$ 52,000	\$ 7,800	fees
35	T	AW #33	When Asked	Install air meters	\$ 97,500	\$ 65,000	grant, federal
36	T	AW #1c	Trig	Information/Education to promote off peak season recreating	\$ 8,450	\$ 8,450	federal, fees, grant
37	T	AW #1d	Trig	Expand reservation system to 50% of the designated camp sites	\$ 161,200	\$ 28,210	federal, grants, fees
38	T	AW #1e	Trig	Administering reservation system	\$ 82,225	\$ 75,725	fees
39	T	AW #1b	Trig	Social Survey	\$ 53,560		federal, fees, grant
40	T	AW #1g	Trig	Enhance information / education	\$ 8,450	\$ 8,450	fees, grant
41	T	AW #1i	Trig	Feasibility study for additional camping	\$ 50,000		federal, fees
42	T	AW #1h	Trig	Limit the number of users in the ISDRA.	\$ 2,368,600	\$ 118,300	grant, fees
43	T	AW #4 AW #5 AW #6	Trig	Camping area development / construction in Rural Management Areas (/acre)	\$ 33,280		fees, grant

FEE COLLECTION STRATEGIES

Primary concerns of alternative Collection methodologies include visitor convenience, cost of collection and cash flow impact.

Several fee collection strategies were reviewed during the development of the original CDDBP. The majority of that analysis remains applicable today; therefore, please refer to that document, if you are not familiar with the various options.

Technically-oriented gadgetry is attractive from several perspectives; however, as stated in the original CDDBP “**. . . revenues and customer satisfaction can both be better influenced through an increased personnel presence regardless of the collection strategy used.**”

Suggested Methodologies

BFO intends to simultaneously implement ALL of the following permit selling and fee collection strategies.

- **Internet**

It has been four years since the CDDBP recommended selling passes online, but the BLM Washington office is undecided and in discussions with GAO (General Accounting Office) or OMB (Office of Management and Budget) about the best way to implement a reservation system—each agency coordinates its own, or all US government agencies utilize the same system—which has created a hesitancy among field offices, throughout the nation, to take action.

Meanwhile, BLM Arizona State Office has implemented an online permit purchase system that is a simple and convenient way for customers to purchase their Use Passes prior to their trip(s). While fairly new, the program has met with a definite degree of success.

The Internet CANNOT be the only venue for customers to purchase passes, but it is certainly a customer expectation in this day-and-age, as well as a customer and staff convenience. Pre-purchased passes would also relieve line/traffic congestion at recreation area entrances because existing permit holders could proceed through entrance stations quickly—perhaps with a separate “Pass” traffic lane. Furthermore, an Internet based system could provide—or even require—completion of an abbreviated questionnaire to complete the order. Questions could vary randomly with each purchase, or could be changed at pre-planned time-intervals to coincide with seasonal concerns and information needs. Contact information (snail mail and e-mail) could be retained for periodic, detailed surveys as well as to mail out newsletters and renewal notices. Some concerns about fraud, through e-mail “sharing” and duplicate receipts, have been expressed. These were sufficiently addressed in the original CDDBP.

Cost of Collection - Internet

The Arizona State Office stated a one-time development cost of \$10,000 to \$15,000; therefore, the Cost-Recovery Analysis amortizes this over five years. There should be no on-going maintenance costs once the system is in place because it will be run on existing government servers. Government processing does not incur the normal discount charge that commercial merchants pay, but it is also possible that this could change. Typical discount rates run from 1% - 5% depending upon average charge amount, volume, and submitted customer information. To be conservative, one percent (2.5%) is utilized in the spreadsheet analysis that follows.

- **Self-Pay Machines**

Self-Pay machines offer the following conveniences:

- change-making - the customer does not have to choose between donating the balance between the fee and the \$20 bill in his/her wallet.
- security - self-pay machines are physically tamper-proof and extremely difficult to remove.
- electronic - self-pay machines will read debit and credit cards; therefore, the customer does not have the no-cash excuse for not paying.
- 24x7 - self-pay machines are available and accessible 24 hours a day, 7 days a week for customer convenience, and do not charge overtime for the extra hours.
- programmability - the interface may be quickly and easily changed to accommodate changes in pricing, dates, announcements, etc. vis-a-vis static signing.
- inhuman - self-pay machines are not human; therefore, they do not require the 20% override for health, retirement, vacation and sick leave benefits.
- durability - the ISDRA experience indicates that the internal electronics of these machines will easily withstand the sun, heat, wind and sand of the dunes, and thus should also perform within the various climates of the BFO.

Self-Pay Machines suffer the following inconveniences:

- contract expense - the ISDRA contract averaged a commission of 22% (about \$220,000); however, the contractor absorbed all related expenses—installation, maintenance, signing, cash-handling, credit/debit card processing, bad card losses and reporting.
- purchase expense - to purchase a single self-pay machine runs between \$12,000 and \$15,000 (depending upon quantity, warranty and delivery). To replace the nineteen (19) currently located in the ISDRA would cost, up-front, \$228,000. Further, BLM would have to hire additional staff to program the internal workings of the machine, to service the machines (add change as needed, collect money and credit/debit card information, update “bad card” data, process the credit/debit card information and generate all reports within the internal cash handling requirements of BLM national policy), pay materials and labor for installation, and physical maintenance—signing, regular vandalism repair, and lighting and transportation. We estimate three staff positions and one-and-a-half to two vehicles~\$190,000 per annum.

Cost of Collection - Self-Pay Machines

The contractor assumes all signing, installation and maintenance costs in exchange for a pre-determined commission/royalty percentage. Last year, this percentage average 22%. This year, the ISDRA management intends to negotiate lower rates for the coming year). The Fee Analysis assumes 15%.

- **Hand-Held Card Readers**

Hand-held Card Readers (Readers) have proven reliable among vendors at various trade shows. For a cost of only a few hundred dollars, they perform the function of recording credit/debit card information, transmitting the data for approval, and receiving the authorization and/or rejection code. Readers can be set up to work in real-time over cellular networks, or can simply store the data for later processing at the office—as the ISDRA self-pay machines are currently administered.

Cost of Collection - Hand-Held Card Readers

Purchase cost up to \$500 each (depending upon quantity), maintenance costs would be rolls of receipt paper, batteries and the same discount fee applied to the Internet analysis. The preceding would be minimal. The wear-and-tear in the outdoor environment would probably necessitate more frequent replacement than experienced in the commercial world, but they should still have a useful life of two years. Therefore, within the spreadsheet analysis, supplies and replacement costs are estimated at \$600, plus the 1% discount rate.

● **User Groups**

User Groups, such as *American Sand Association*, *American Sand Foundation* and the *DUNERS* (to name but a few) should all be encouraged to sell the Use Passes directly to their respective constituencies. Such a relationship:

- encourages pre-trip purchases,
- provides direct communication between the BLM and the constituent groups as orders are processed,
- encourages bulk purchases,
- provides an opportunity for the user groups to earn additional funding—important to all not-for-profit, membership-based organizations, or
- provides user groups an opportunity to offer an additional service to their members, specifically, a discounted Use pass (i.e. instead of charging the full price to make money for the organization),
- provides a focused opportunity for the groups to communicate with their members about the Use Fee and surrounding issues.
- user Groups can say the same thing that BLM staff say, but the public will accept it with more credibility when coming from “one of their own.” By pointing out that doubling the compliance rate would generate the same revenue to the BLM as doubling the price, the user groups should be able to improve overall compliance, especially on non-holiday weekdays and weekends when BLM Law Enforcement is not out in force.
- demonstrates, in a tangible way, the BLM’s desire to strengthen and encourage these groups.

Cost of Collection - User Groups

This could and should vary from year-to-year based upon actual experience and feedback from the User Groups. Initially, the ISDRA will adopt a 15% discount for bulk purchases—based primarily upon the 22% paid to the vendor at ISDRA (recognizing that they incur specific costs associated with providing and servicing the machines, and that the ISDRA management intends to negotiate lower rates for the coming year).

● **Vendors**

On-site, permitted vendors as well as off-site enterprises should also be encouraged to sell the Use Passes. This will:

- provide direct communication between the BLM and the vendors each time a bulk/wholesale order is processed,
- encourage bulk purchases,
- provide an opportunity for the vendors to earn additional money to offset their Vending Permit Fee,
- encourage vendors to support the Use pass effort and to explain why—instead of commiserating and lambasting it with customers, and
- improve compliance on weekdays and non-holiday weekends when BLM Law Enforcement is not out in force.

Retail Price

A couple of questions have arisen about the resale/retail price. Specifically, should vendors be allowed to sell the passes at any price they desire, or should the BLM mandate a retail price? Because selling through third parties will be a new endeavor this year, we recommend allowing the vendors (as well as the User Groups) to sell at whatever price they deem appropriate. Some will want to use the permit as a “loss-leader” to draw customers into the store. Some will carry a few just so they do not have to say “no” to existing customers, but certainly not as a money-maker. Others might actually want to charge more than face-value.

Flexibility in pricing by the vendors might also provide insight into permit values as they relate to distribution channels, and finally, to create yet another “requirement” that will be nearly impossible to enforce and appears to be counter-productive.

Cost of Collection - Vendors

This could and should vary from year-to-year based upon actual experience and feedback from the Vendors. Initially, the ISDRA will adopt the same 15% discount for bulk purchases to User Groups.

● **Entrance Stations**

Four years ago, BLM staff and consultant were opposed to entrance stations for the following, primary reasons:

- Increased Staff Expense,
- Money-handling risks (safety to employees as well as potential for employee fraud),
- Impact upon traffic, i.e. backing up lines onto public roadways while entering,
- Inconvenience to Season Pass holders.
- Use Fees, as opposed to entrance fees, cannot be enforced unless the visitor stays for more than thirty (30) minutes.

Let’s discuss each of these objections individually:

- *Increased Staff Expense.* The ISDRA experience indicates that increased staff is a **pre-requisite** to compliance; therefore, we should not immediately discount entrance stations because of increased staff expenses. Proper implementation of entrance stations should actually increase compliance as much as or more than increased law enforcement—certainly at a lesser expense than contracted, weekend-overtime LEOs with vehicles.
- *Money-handling Risks.* We recognize the inherent risks of money-handling, but the private sector, California State Parks and National Park Service have all successfully addressed this issue and continue to utilize entrance stations everyday. Certainly, with today’s audit-designed cash registers, wary public, and revised BLM cash handling policies, employee fraud/theft could not exceed the increased revenue generated by increased compliance.

Employee safety could be addressed in the same manner that the ISDRA Self-Pay contractor addresses it—they service the machines in twos (or more) and they vary the schedule—both time of day and day of week. The entrance station should have the newer, lock box Iron Ranger built into it, basically a “safe,” and the person in the “station” should not be provided a key (external signs should indicate this fact). A separate two-person crew, including one LEO, could retrieve the box and cash register audit

report and deliver both to the field office or ranger station (depending upon the applicable cash-handling policy) for processing by the cashier staff.

The Chief LEO should probably assign a rotating LEO with a quad or rail to co-staff the entrance station with the Park Ranger, to discourage theft as well as to encourage compliance; specifically, to discourage an individual from simply driving past the station without stopping.

Furthermore, looping video cameras should be installed—ideally, the split-screen recorders that can simultaneously record four different cameras. One should be easily visible to the entering public—primarily as a deterrent. One could record the front or back approach, one could record the financial transaction/exchange between the ranger and the vehicle driver, and one could focus upon license plates—as at parking lot exits.

- **Impact upon traffic.** This too is a legitimate concern, but location of the entrance station and arrangement of the traffic lanes (such as a lane for existing pass holders that could be waved through), and/or a *turnout area* such as on Gecko Road to the Self-Pay machines (ISDRA), should mitigate most of the concerns. Again, long lines have not forced National Parks to cease charging fees upon entrance. Furthermore, by selling passes ahead of time on the Internet and through User Groups, an increasing share of visitors should be waved through the “Pass” lane.

One final note, Little Sahara utilizes a permanent entrance station and, for busy weekends, an additional mobile entrance station with a pallet-like base that is easily moved into position with an on-site forklift from the maintenance department.

- **Inconvenience to Season Pass holders.** So what? A separate lane, such as the express checkout at the grocery store is sufficient to let them know that you appreciate them and are minimizing the impact upon them. Besides, if one particular personality type just can't stand the long lines, this could be one more little reason for them to change their weekend of visitation to a less-crowded weekend.
- **30-minute Leeway.** *Some people spend more time and money researching ways to get out of their responsibilities than it would cost to just “Cowboy Up” and take care of them!* Personally, it's a great “rule” because a traveler might want to drive through the area without actually using it, but the jaunt would attract them to come back in the future as a paying customer. Therefore, how can the BLM deal with the knuckleheads? Ferris Clegg, Project Manager at Little Sahara, simply charges visitors the normal fee and provides a time-stamped receipt (default setting on the cash register) and offers them a full refund if they come out within an hour. This is GREAT! Not only does it answer a legitimate question, but it diffuses any serious concern about taking advantage of the customer/public by going-the-extra-mile and DOUBLING the free

“inspection” time.

ISDRA staff should have the Self-Pay Machine contractor program the systems to issue credits (cash when appropriate) when activated by a contractor or BLM “access” card.

Cost of Collection - Entrance Stations

Entrance stations obviously incur more initial capital costs and on-going staff costs; however, as proven beyond doubt during the past four years some form of entrance/exit station is required for all of the preceding collection methods. A dual-sided entry station seems to be the better of the preceding options—Entry, Exit, campsite visits—combining on-site convenience with an efficient ability to conduct simultaneous entrance and exit permit checks at a more efficient rate than campsite visits. Please note that campsite visits are intended primarily as a necessary and appropriate customer service and public relations activity, but that they can also serve as a collection/enforcement methodology.

- **Consignment**

Consignment Sales of the Use Passes through commercial vendors and associations should broaden the distribution base, but requires a great deal of administration time to guard against fraud.

Because of the requisite lead time to develop the contracts and the administrative time, ISDRA staff will concentrate upon the discounted (“wholesale”) distribution program through vendors and user groups during this first year of implementation and respond to their feedback as to the desire and/or need for a consignment program.

The Forest Service Adventure Pass program does not distribute passes on a consignment basis, but through a vending agreement, allows commercial enterprises to purchase the passes at a discount and to resell them at face value. Therefore, the only directly relevant experience which might have developed some vendor expectations actually supports the discount method of distribution.

Finally, those vendors who are willing to invest some of their own money into the program, are also more likely to aggressively promote the program.

The exceptions to the preceding consignment discussion are the membership associations which ISDRA staff want to encourage to promote and sell passes. They are all not-for-profit organizations and typically do not have the cash reserves to “invest” in pre-purchasing passes. They should probably be approached first about a consignment program, but while awaiting contracting office approval/direction, the membership associations could be allowed to take the discounts on smaller minimum (bulk), or they could pre-sell passes to their membership and then place a bulk order at a pre-determined and announced date that would qualify for the discount.

Table 12 - Collection Strategy Pros and Cons

Collection Option/Strategy	Pros	Cons
Entry / Ranger Stations / Visitor Centers	<ul style="list-style-type: none"> • Personal • Opportunity to Answer Questions • Ability to Provide Additional Info • No travel to collect from machines 	<ul style="list-style-type: none"> • Expense • Limited Hours of Operation • Inconvenient versus Dispersed Machines near each site. • Surveys Ranked Visitor Centers a Relatively Low Priority/Benefit
Free Access	<ul style="list-style-type: none"> • No Collection Expense • No Personnel Responsibility • Customer Convenience • No Impact upon Visitation 	<ul style="list-style-type: none"> • No Personal Contact • Missed Opportunity to Provide Additional Info • No Income
Iron Rangers - Older Design	<ul style="list-style-type: none"> • Inexpensive • Limited Vandalism • Familiarity • Customer Convenience 	<ul style="list-style-type: none"> • No Personal Contact • Missed Opportunity to Provide Additional Info • Voluntary Compliance • Time-consuming to “fish-the- money-out”
Iron Rangers - Newer Design (with accompanying signage)	<ul style="list-style-type: none"> • <i>Relatively</i> Inexpensive • Limited Vandalism • Familiarity • Customer Convenience • “Tamper-Proof” • Less Time-Consuming to Collect (vis-a-vis <i>Older Design</i>) 	<ul style="list-style-type: none"> • No Personal Contact • Missed Opportunity to Provide Additional Info • Voluntary Compliance • Requires Physical Trip to Gather Money Containers • Easy to defraud with “receipt”
Internet	<ul style="list-style-type: none"> • Inexpensive • No Vandalism • Familiarity • Customer Convenience • “Forces” Personal Contact to Exchange Receipt for decal/placard • Progressive Image 	<ul style="list-style-type: none"> • No Personal Contact • Discount Fee charged by financial institution reduces net income • Fraud-Risk • Inconvenient if Require Second-Step of exchanging receipt for decal/placard in person.
Membership Association (District-wide)	<ul style="list-style-type: none"> • Customer Convenience • Opportunity to Collect Demographic Data • Opportunity to Develop Long-term, Personalized Relationship • Sense of Ownership & Privilege 	<ul style="list-style-type: none"> • Difficult to Track which Sites are visited (totally dependent upon customer feedback) • Difficult to Track Frequency at which Sites are visited • Sense of Ownership & Privilege
Self-Pay Machines	<ul style="list-style-type: none"> • Inexpensive Start-up • Limited Vandalism • Customer Convenience • “Tamper-Proof” • Accepts Cash AND Credit • Credit Purchases Provide Customer Information • Administration is contracted out • Receipts cannot be falsified 	<ul style="list-style-type: none"> • No Personal Contact • Missed Opportunity to Provide Additional Info • Voluntary Compliance • Expensive Administration fee • Fraud-Risk w/Credit Cards • Electronics Subject to Malfunction
Smart Cards	<ul style="list-style-type: none"> • Inexpensive Start-up • Limited Vandalism • Customer Convenience • “Tamper-Proof” • Less Time-Consuming to Collect • Credit Purchases Provide Customer Information • Can eventually be incorporated into the Self-Pay Machines 	<ul style="list-style-type: none"> • No Personal Contact • Missed Opportunity to Provide Additional Info • Voluntary Compliance • Expensive Administration fee • Requires Physical Trip to Gather Money/Credit-Info Containers • Electronics Subject to Malfunction
Hand-Held Card Reader (for campsite visits)	<ul style="list-style-type: none"> • Inexpensive Start-up • Personal Contact • Customer Convenience because it is mobile • “Tamper-Proof” - mitigates employee theft concerns • Cash-Less - mitigates employee safety concerns • BLM convenience because it is mobile • Credit Purchases Provide Customer Information • Can be processed by Field Office staff 	<ul style="list-style-type: none"> • Fraud-Risk w/Credit Cards • Electronics Subject to Malfunction • Discount Fee reduces net income • Some LEOs will react negatively <ul style="list-style-type: none"> • <i>we’re not “meter maids”</i> • <i>just one more thing to carry</i> • Some risk to employee safety

In summary, the ISDRA experience of limited compliance without LEO staff, suggests that a personal staff contact is a requisite—whether at an entrance station, while providing information—or as a campsite visit. As the *Friends of El Mirage* have pointed out, an entrance station presence provides an opportunity to inform the visitor of current closures, activities, events, et cetera, and to obtain some personal feedback from each visitor.

Combined with the time demands of visiting each and every camp in these spatially diverse dunes areas, the remoteness from entrance stations of many camps, and the employee safety concerns, spot checks cannot be relied upon for compliance. However, spot checks should be run periodically, especially an occasional mid-week and non-holiday visits, with a Ranger and an LEO, two-person team.

In order to minimize the costs of collection, we would prefer to see automated “gates,” like those for entering airport parking lots, except they should be capable of activation by a season pass, credit card or cash—basically, a self-pay type machine that controls a gate. However, this is not “feasible” in the current customer relations environment, nor the current staffing environment.

BLM staff have expressed a legitimate concern that to install an unstaffed gate at this time would simply invite vandalism. Further, to work the bugs out of such a new system requires time—something neither the BFO, nor the ISDRA have at the moment. Thus, such a technological implementation/advance appears to be about five years out from a practicality and workload feasibility point of view.

Finally, do not be afraid to experiment. You are exploring new territory here, especially for your agency.

Overarching Concerns

Compliance and the need for enforcement to achieve compliance are the two most obvious concerns arising out of the ISDRA’s four-year Fee Demo experience. Without LEO-staffed checkpoints, compliance has been dismal. Several issues come into play when discussing compliance and enforcement.

- Non-Law Enforcement Officers (LEO) cannot issue tickets; therefore, they cannot enforce a Use pass requirement on someone determined to not comply.
- The penalty/fine is not a sufficient deterrent; it is too low.
- The penalty/fine does not come back to the site, nor the Field Office.
- Contracted, external LEOs do not enforce the permit; LEOs are Not “Meter-Maids”

Again, let’s discuss these one-at-a-time:

- *Non-LEO staff cannot issue tickets, and the public knows it.* I would not have believed this if I had not experienced it myself. These folks are worse than the ones taking advantage of the 30-minute Leeway for Use. And the ones that we encountered had their children with them—what a great example! *We experienced this visiting individual camps, not at an Entrance Station.*

This is, in fact, true—only fully-delegated (“Level 1”) law enforcement officers (LEOs), can issue tickets. The BLM does not have any Level 2 Park Rangers who can issue tickets/citations for park-specific violations. (As an aside, it turns out that all federal agencies are phasing out Level 2 “citation authority” because of employee safety concerns in our changing society—specifically, more confrontational, defiant behavior from visitors). However, the Forest Service Rangers are not

necessarily issuing tickets either, but rather *Failure to Pay Notices*. During the first three years of the Forest Service’s implementation of fees, this was a major point of debate—and legal battles. A *Failure to Pay Notice* simply notes the violation, date, time and license plate and informs the visitor how to rectify the violation. It does not, by itself, attach to a person’s, nor their vehicle’s permanent record.

What apparently enables this approach, and gives it some collection teeth, is that it does not contain any of the following words: *compliance, ticket, citation* nor *law enforcement* that could be construed to mean “criminal violation.” In short, the *Failure to Pay Notice* represents a commercial transaction that can then be sent to collections and ultimately small claims court. This process also contains an administrative fee and reimbursement of small claims fees which can be deposited directly into the Fee Demo account instead of going to Washington or the county.

Some BLM Field Offices have resolved this limited “manpower” issue—to enable non-LEO Rangers to assist with compliance checks—by issuing a *Notice of Violation* or a *Notice of Non-Compliance*. Such notice simply notes the violation, date, time and license plate and informs the visitor how to rectify the violation. It does not, by itself, attach to persons’, nor to their vehicles’ permanent records.

Ferris Clegg, with the BLM’s Little Sahara Recreation Area, has enhanced this approach by issuing *Notices of Violation* (see faxed sample in Appendix 3), that inform the visitor how to correct the violation—specifically, not having a valid Use Pass. They are allowed to go to the ranger or entrance station and correct the situation. Ferris provides his copy of the pertinent information to an LEO at the ranger station at the end of the day or week, depending upon schedules and volume of visitors. If the visitor has not “exchanged” the *Notice of Violation* for a Use pass, the LEO mails them a real ticket/citation. Smart.

- *Penalty/Fine is not a sufficient deterrent* is another legitimate concern. However, California Vehicle Code §38301 requires compliance with federal regulations and carries a higher fine than do the federal codes—*instruct the qualified LEOs to cite violators under this law*. BLM staff should also work with the appropriate court systems to update appropriate collateral bail schedules.
- That the *penalties/fines for federal violations do not come back to the site, nor the Field Office* is a further deterrent to devoting limited staff time to issuing tickets for non-compliance. This is yet another motivation to write-up a *Notice of Violation* about the more expensive state vehicular code violation, and that the forthcoming ticket can be avoided by simply stopping at the ranger/entrance station and purchasing a much less expensive Use Pass.
- *Enforcing the permit requirement is not a high priority with visiting LEOs.* Visiting LEOs are, in fact, brought in on the major holiday weekends for the primary purpose of enforcing public safety issues, and serious and violent crimes. Compliance issues, albeit within the purview of all officers, visiting or not, are dealt with as the mission and circumstances allow. However, as within any organization, the direction and relative importance of various issues and policies comes from the top. First and foremost, the Field Manager, Project Manager and Chief LEO must present a united and consistent front, day-in-and-day-out to all classifications of employees. This must especially be conveyed at the interagency law

enforcement orientations for the big holiday weekends.

Checkpoints - The ISDRA office has had the most success with setting up checkpoints on the day that most of the recreationists leave the area. Understandably, this has generated some complaints, especially from recreationists who did purchase a permit and are eager to return home. The same arguments for-and-against entrance stations could be made for-and-against this practice. *If it ain't broke, don't fix it.* Therefore, the ISDRA should continue this practice, but expand it to include ALL weekends.

North Algodones Dunes Wilderness

While it seems only fair that visitors to the *North Algodones Dunes Wilderness* should also pay a fee, it is doubtful that much, if any, revenue will be generated from the area because visitation is so low.

To collect the same Use Fee that all others to a Management Area pay is morally and legally justified, but based upon existing visitation estimates, not worth the requisite infrastructure changes.

At most, the BLM should probably install Iron Rangers—the newer version to comply with your cash-handling procedures—and traffic counters to develop some real data. Signing should be professional, encourage guests to sign the guestbook—which apparently needs to be bolted down—and request “donations to enable the BLM to continue to protect the area from urban and recreational encroachment.”

These funds should be earmarked as Fee Demo—use of the term “donation” is simply a marketing twist because you know that the areas do not have the visitation numbers to justify a Self-Pay machine, nor a staffed entrance station—to be reinvested back into the Wilderness for signing, fencing, maintenance, etc.

Events Participants and Sponsor Members

We include the following excerpts from the BFO Business Plan discussion because the BFO has a large number of competitive and commercial events from which we gain a broader perspective.

Roy Creel of the Southern California Timing Association (SCTA) raised an important and legitimate question: “. . . how we can handle the 550+ members of the SCTA using the Lake for our scheduled events.”

After discussing the situation with Mr. Creel, it is our contention that his concern about “double-taxation” is

representative of most event promoters. This perception is caused by poor communication and documentation because of the newness of the Fee Demo Program.

Special Recreation Permit fees for Event sponsors are designed to recover staff time for processing and servicing the permit/event—similar to the fee paid by a vendor to occupy a display booth at a county fair—and to ensure that the “public” (through the governing agency) receives some financial remuneration for the commercial use of public land. These fees are calculated in one of two manners—Commercial Non-Competitive events are charged a 3% commission on gross revenue, while Commercial Competitive events are charged \$4 per competing participant.

The Use pass fee charged to visitors is applicable to all on-site visitors and is intended to recover the operating costs that keep the recreation area open, such as trail and roadway maintenance, law enforcement and emergency medical services. While not an “Entry Fee” in government parlance, it might help to understand the relationship between the two fees to think of the Use pass fee as the admission price that the general public pays to get into a fair.

Within this perspective, therefore, the SCTA, and similar membership event sponsors, should be charged as follows for their Event Passes:

- 1) The issued permit should provide for exclusive use to a specified area and delineate the area as such.
- 2) BLM should then charge the Special Recreation Permit (SRP) standard \$160 exclusive use fee.
- 3) The existing Special Recreation Permit fees should continue to be applied.
- 4) BLM staff should work with each sponsoring organization on an individual basis to determine the best methodology for issuing Use Passes to their event participants. For example, sponsors could purchase passes at the bulk discounted rate, and distribute them directly to their participants (absorbing or recovering the cost as they see fit), or the sponsor could provide a list of registered participants to BLM staff which could be read and checked-off at the entrance station(s). Conversely, sponsors could just inform participants that there is now a BLM Use Fee to participate in the event—bring cash and “plastic.”
- 5) Non-participating members of the organization(s) would then be treated as any other visitor and be required to purchase a 7-day use pass or a season pass to gain admittance.

SELF-PAY MACHINE CONTRACT EXTENSION

The ISDRA must extend the existing contract for Self-Pay machines with Universal Parking for two-years. Consultant has no vested interest in this issue, but believes that extending the contract is a necessity for the following, rather obvious, reasons.

- Loss of ISDRA Staff
- RAMP Implementation
- Impractical Timing
- Requisite NEPA Delays
- Conflicting Objectives
- False Expectations
- Customer Service
- Loss of Revenue

Loss of ISDRA Staff

The ISDRA recently lost three full-time staff through transfers and promotions out of the area; thus there are no longer any full-time, on-site staff. The continuing statewide hiring freeze necessitated by the ISDRA's multi-million dollar losses since implementation of the Zero-Tolerance policy means that not only is there *no personnel presence* for interacting with the public and the vendor in regard to the machines, but that *the responsibility will be assigned to El Centro-based staff—as a secondary, if not tertiary, duty that requires special trips to the ISDRA, delayed response, and loss of focus on one of the most critical management times in ISDRA history.*

RAMP Implementation

Implementation of the newly adopted RAMP is going to add an additional, unpredictable strain on the already over-tasked, remaining staff. Not only will the numerous new activities of the RAMP require a great deal of on-the-ground staff time, but several related legal challenges should also be anticipated which will drain additional resources and detract from what little staff time might have been available.

Impractical Timing

ISDRA staff have worked hard to coordinate the adoption and implementation of the RAMP with this business plan, but this well-coordinated effort actually leaves insufficient time to correctly and fairly administer a *Request for Bids* for a construction, installation, staffing, programming, and debugging endeavor. In a nutshell, drafting, publishing and distributing a RFP/RFB will require at least 30 days (August), an additional 30 days (minimum) must be allowed for receipt of proposals/bids (September), then at least 30 more days must be allowed for the NEPA process (October), then 30 days for the contracting office to approve and execute a contract (November), and then the winning company must order equipment, install footings, install the equipment, and modify and test the computer program (December).

Assuming that all of this goes without a hitch, BLM's already reduced staff will have to work with the new contractor to "train" their employees to properly interact with BLM and other agency LEOs on the weekends of high visitation—yet another unnecessary cost. If *anything* goes wrong, the ISDRA could be without self-pay machines as late as December. ISDRA management and cashiering policies currently prohibit *in-the-field* handling of cash by BLM employees; therefore, ANY down-time of the self-pay machines equates to lost revenue.

Requisite NEPA Delays

The existing contract with Universal Parking requires the contractor to remove the self-pay machines AND the improvements. Specifically, this requires the removal of all of the concrete footings/foundations supporting each of the nineteen (19) machines. Therefore, to install new

machines with footings will require sites to succumb to the NEPA process—yet another delay and drain upon staff resources—that must be completed by late August or early September to allow time for construction and setting of the new footings prior to installation of the actual machines. To complete the bid process and the NEPA process before September has to "assume" no negative impact determinations nor any legal challenges through the NEPA process—too many variables begging for "Murphy's" interference.

Conflicting Objectives

The objective of this business plan is to price the Use pass at a level that will recover the necessary costs to continue to operate the ISDRA while minimizing the impact upon recreationists.

The objective of a bid process is to ensure that taxpayer money is responsibly dispersed.

To implement a bid process that will culminate in a loss of revenue, decreased customer satisfaction and, thereby, decreased compliance defeats both of these efforts.

A two-year extension is recommended for the following reasons:

- 1) to move the self-pay machine contract to the same schedule as the bi-annual Use Pass pricing review;
- 2) to analyze the impact of the increased Pass distribution channels (Internet, User Groups, and on-site as well as external vendors) recommended within this business plan upon self-pay machine usage;
- 3) to coordinate the self-pay machine contract with the bi-annual on-site vending program review; and
- 4) to build-up sufficient capital (based upon projected revenues) to allow the BLM to realistically consider buying the machines and staffing them internally.

False Expectations

Any entity bidding on this contract will expect the percentage compliance and, therefore, the total ticket volume through the machines to remain about the same this coming season as was experienced during the immediately completed season. However, this very document recommends experimentation with several new distribution channels (user groups, vendors and Internet in particular), whose impacts upon self-pay machine volume are nearly impossible to predict and therefore, difficult to disclose correctly within a RFP/RFB. If a new contractor wins the bid, makes a large investment based upon previous experience and then does not even achieve a break-even volume because of the unpredictable competition through these new channels, the ISDRA (El Centro Field Office) would be inviting legal action. While the ISDRA would likely prevail in such a challenge, it would just be one more distraction and misuse of staff time and already shrinking budgets.

The existing contractor, however, has already recovered their initial investment (*consultant's "assumption" because they have been on-site for four years, not a fact communicated by any contractor representatives*), and has *informally* expressed a willingness to work with the new experimental distribution channels.

Customer Service

The ISDRA is simultaneously implementing a new RAMP and increasing Permit Fees in the midst of a hiring freeze and loss of three key employees. Even with a full staff, implementing a price increase is a precarious balancing act that requires a great deal of personal, personnel

attention to customer relations. ISDRA personnel are going to have their hands full implementing the new fees, communicating with customers, and building relationships with user groups and vendors without trying to implement new electronic and mechanical devices while having to build new relationships and lines of communication with a new vendor.

Loss of Revenue

To disrupt or delay the availability of the ONLY method of payment/collection that the visitors have experienced for the past four years ensures visitor frustration and protest at the same time that the BLM is trying to increase fees—such an effort mandates failure with a significant loss of revenue.

Forty-percent of visitation occurs during the first two months of the visitor season (primarily Halloween and Thanksgiving weekends). Any disruption during these two critical months would wreak havoc upon compliance, and devastate the budget for the remainder of the fiscal year. As an example, a mere ten percent decrease in compliance during these first two months would result in a loss of \$215,570. ***Even if some enterprising bidder comes in at one-half the current contractor's nominal commission, the ISDRA would lose a net \$100,000 by disrupting service at such a critical period in fee implementation.*** Adding in lost staff time, NEPA-

compliance, publication, notification and contracting costs, the ISDRA is actually looking at a net loss approaching \$200,000—not a wise use of taxpayer money.

Long-Term Solution

The ISDRA will recommend new Use and Vending fees consistent with the new RAMP and this business plan. The RAMP calls for a review of these fees every two years. Therefore, the ISDRA should

- extend the existing contract with Universal Parking for two years to cover the 2004 and 2005 visitor seasons (October 1, 2003 through May 31, 2005).
- conduct the first bi-annual fee review during the months December 2004 - March 2005, including analysis of the distribution channel split (i.e. how many sold through each channel: self-pay machines, user groups, vendors and Internet).
- if fee analysis suggests continuing with self-pay machines, draft and distribute a RFP/RFB not later than April 30, 2005 that requires a debugged, fully-functional installation not later than September 15, 2005.

VENDORS

Background

Vending may be allowed on BLM lands to “enhance the recreational experience” of visitors, but it is not mandated that Field Offices allow it. Table 14 on page 45 lists comparative vending fees charged by area OHV Shows (expositions) and area fairs.

Consultant recommends that vendor pricing be **based primarily upon cost-recovery**, and secondarily upon an **Fair Market Value (FMV)**. **The need for cost recovery should be obvious, especially because the BLM is not required to allow vending; therefore, they should not subsidize processing, monitoring and enforcement costs. Fair Market Value is** intended as a comparison to similar private sector activities to 1) verify that the cost-recovery basis is not too expensive (in which case we would recommend that vending not be allowed—if it costs more than it is worth to the recreating public, then the BLM should not subsidize it), and 2) ensure that the BLM is not charging such a “below market fee” that it is inadvertently subsidizing unfair competition with surrounding private property-based commercial endeavors.

Consultant was directed to remain open-minded to all views and to consider any options, *from discontinuing the vendor program altogether to ignoring the concerns of the private property owners and continuing as-is in a laissez-faire manner*. Consultant also visited with recreationists while on-site as well as many others via telephone and at other meetings. While the interviews were informal and, therefore, not statistically significant, a general consensus among ISDRA OHV recreationists was that they really appreciated the vendors for three reasons:

- 1) **atmosphere:** *“they add to the atmosphere that makes the Dunes unique. We take the kids to the vending areas every visit because its reminiscent of the traveling carnivals that visit small towns.”*
- 2) **competition:** *most visitors felt that the private-property-located businesses were gouging them, especially without competition, and*
- 3) **convenience:** *especially for those recreationists off of Gecko Road (about seven miles west of the Glamis Store), and off of Highway 8 (about thirty miles south of the Glamis Store).*

Private property owners are concerned that vendors on the public lands are cutting into their business—nothing wrong with a little competition, but they do not want the BLM subsidizing that competition through lower-than-market “rents.” However, even the private property owners expressed a need for vendors on the weekends, especially the six major holiday weekends, because there are so many people that the private businesses cannot service all of them.

On the other hand, some vendors admitted that vending is not an obligation of the BLM and that many of the vendors did not technically enhance the recreation experience. Of course, “enhance” is not defined within the regulations that allow for “vending . . . to enhance the recreation experience.”

In complaining about the mid-week presence of vendors, the private property owners often cite a “three mile limit” from the 1987 RAMP (Recreation Area Management Plan). On page 98 of that document, paragraph 8-2 actually states:

“Do not approve permit applications for the vending of goods or services similar to those already available from businesses located on private land within three miles of the proposed mobile vendor business location on public land.”

Discussion: The draft nationwide BLM policy on mobile vendors specifies that vendor passes will be considered whenever ‘similar goods and services are not available within the immediate travel area.’ The intent of this policy is to limit commercial activity on public lands to those cases where a public need does in fact exist. When similar goods and services are available within the immediate travel area, the need for vending activity on public lands is minimal.

Three miles is considered a reasonable definition of the ‘immediate travel area’ in the dunes. This means that vendors will not be permitted to operate within three miles of private businesses at Glamis or Boardmanville if similar goods or services are available at those businesses.

The Area Manager, El Centro Resource Area, will make the determination as to which categories of goods or services are ‘similar’ to those at adjacent private businesses, following annual consultation with the operators of the businesses to determine services offered. A list of categories of goods or services for which permits will not be issued within the three-mile zone will be developed at the beginning of each use season.”

The conversation with the owners of the Glamis Store implied that the “three miles” was not as important as the fact that the vendors are setting up along the very sand highway route that recreationists use to get to the store and selling some of the same products and services.

Ultimately, consultant was directed, as with the Use pass fees, to develop a pricing plan that is consistent with the RAMP because the RAMP has gone through a public hearing process.

The new RAMP attempts to reconcile these two competing interests by allowing the vendors to continue to set-up-shop adjacent to the property line Friday - Monday, but not mid-week (Tuesday, Wednesday, Thursday) excepting major holiday weekends which allow for seven or more days.

To accommodate the vendors that desire to continue to remain on-site throughout the week, the BLM has constructed a vendor pad on Gecko Road, just after turning off of Highway 78, that allows for a mid-week, overnight presence. *(To consultant’s knowledge, no other BLM sites allow vendors to stay on site for an entire use season)*. Vending is also allowed within the southern management areas off of Highway 8.

Program Expenses

The following vendor permit price recommendation is based upon recovering the following program costs:

- **Personnel (2):** one permit administrator and one part-time, on-site LEO Ranger to enforce the passes, inspect and correct problems/concerns within each of the vending areas, such as traffic flow, signing, and toilet conditions (remember the vendors are helping to pay for them), and to coordinate delivery and receipts of Use Passes with those vendors who have chosen to sell them.
- **Vehicle & Equipment:** One vehicle and communications equipment, for the LEO Ranger
- **Dumpsters:** There is much discussion, and disagreement, about whether or not to provide trash dumpsters for the recreating public. The new RAMP calls for the development of ADA-compliant trash

collection facilities (Action AW #9). User surveys and interviews reflect two dichotomous opinions:

- provide dumpsters as a convenience to the recreationists and to protect the environment, or
- do NOT provide dumpsters, make the users practice the "Pack It In, Pack It Out" creed.

Providing dumpsters at each vendor area:

- attracts visitors to the vendor areas,
 - allows vendors and vendor-area signing to encourage discarding of item-packaging before leaving the vending area.
 - provides a limited "test market" of customer reactions,
- **Signing:** large signing should be provided to direct OHV recreationists toward the various vending areas and toilets. The same signs should also encourage use of the vending area dumpsters.
 - **Vault Toilets:** There is no doubt that more public toilets are needed at the ISDRA. Currently, portable toilets are brought in for the six major holiday weekends. Phasing in two vault toilets per year among the vendor areas would help to reduce the dependency upon portable toilets, provide service during non-holiday weekends, and also offer another "draw" to the vendor areas.

Fair Market Value

Some vendors suggested that we survey commercial rental rates in the nearby (20 miles) town of Brawley, but Brawley is not on-site, and Brawley does not deliver the customers to the business; therefore, it is not a relevant comparison. Other vendors suggested that we calculate land values in the immediate area and charge only the equivalent in property taxes because the BLM should not be making money. However, property taxes represent only one small component of management costs in any operation, and hardly seem relevant when analyzing a vending space with dimensions of 45' x 65'.

One vendor suggested basing the fee upon number of employees. This sounds fair to the smaller vendors in that increased volumes of customers generally require increased employees to handle the volume; therefore, more successful vendors would pay more for a permit than smaller vendors or vendors with a smaller margin. However, this consultant spent ten years managing membership organizations which experimented with flat fees, employee-based fees, assessed property values, gross sales, and numerous other schemes. All such schemes require additional, expensive enforcement mechanisms which only penalize the honest vendors and increase the underlying cost to all vendors. A full-time, on-site enforcement person would be required to monitor the comings-and-goings of vendor staff and their various registrations and licenses. Worse than the cost of this position would be its negative impact upon vendor relations—especially during high-traffic periods with long lines of customers.

Therefore, for the Fair Market Analysis, we chose to

compare commercial vending at the ISDRA to commercial vending at similar gatherings, specifically, exhibition space. The rationale for an *exhibition model* is quite simple: the vendors are marketing to the on-site, ISDRA recreationist. The ISDRA delivers from 15,000 - 41,000 recreationists each non-holiday weekend throughout the primary visitor season (October - May) and 63,000 to 250,000 on each of the major holiday weekends (Halloween; Thanksgiving; New Year's Eve; Presidents Weekend; Martin Luther King, Jr.; and Easter).

Our survey of *event oriented exhibits* included the *Sand Sport Super Show*, and southern California Fairs (as far north as Kern County and as far south as San Diego County). **Exhibition booth fees ranged from \$475 to \$2,600 for mere 10' x 10' spaces.** Many included electricity, many did not. Some charged extra for the electricity. The use of OHV-related exhibits is obvious. The use of County Fairs, however, is somewhat anecdotal and intended to keep the comparative price down. Most industrial shows charge \$5,000 - \$10,000 for exhibit space—especially those that deliver the huge numbers of visitors that the ISDRA provides. However, such large fees are obviously incongruous with the ISDRA environment—even for those vendors who exceed \$50,000 in weekend sales on the major holidays.

We also talked with BLM Field Offices that managed "similar" recreation areas, but found that they were all following the national Vendor Policy which charges the greater of \$80 or 3% of gross revenues. Of course, none of the other Field Offices had more than ten - twenty vendors throughout the season, nor did they have visitor numbers approaching the high visitation level of the ISDRA.

Regarding the percentage versus daily rate approach, since 1980 the ISDRA has experimented with a daily rate that ranged from \$20 in 1980 to \$25 in 1991 to the current \$15. Prior to Greg Thomsen's arrival as ECFO Manager, the ECFO experimented with a change from the \$25 daily rate to the \$80 / 3% of gross formula. Even with more than 100 vendors, aggregate vending revenues decreased. The previous ECFO Manager attempted to return the daily rate to \$25, but caught so much flack from the vendors that he set it at \$15 as a temporary compromise—awaiting the completion of a business plan. Regardless, even the \$15/day rate increased total vending permit revenues above the 3% of gross sales rate!

Immorality and Inflation

Upon discussing our first-draft recommendation, one vendor complained that to jump from \$15 per day to an equivalent of \$50 per day was immoral. This did motivate us to review the historical pricing referenced above and to calculate inflation-adjusted prices based upon the historic prices. The 1982 daily rate of \$20 would now (2003) be \$35.36 while the 1981 daily rate of \$25 would now be \$33.72.

While we were not commissioned to review the existing \$80 / 3% of gross revenues regulation, we did make several inquiries throughout southern California and found that the vast majority of private-sector leases (from vending space to vending carts and from bare land to improved land) that included percentage clauses, ranged from 10% to 25%—significantly above the existing 3%.

Price Recommendation

To recover the preceding costs, we recommend a differential pricing scheme similar to the Use Pass: one price for non-holiday weekends, and another price for holidays. Originally, we recommended that the event-based model include an event-based price. However, after visiting with three “slightly” vocal vendors—for the third time each—we are convinced that vending permits at the ISDRA should continue to be based upon a daily rate instead of a fixed period, such as a weekend, or holiday of specified duration. The rationale that convinced us to change our initial recommendation was that smaller, part-time vendors who have other careers and commitments, but who still contribute to the atmosphere and diversity do not necessarily stay for an entire holiday period and that, depending upon the particular product line being offered, some days were actually better than other days and the vendors should be allowed to choose which days they vend without having to pay for the entire period. Also, during our discussions, each vendor immediately converted the event-based prices to a daily rate based upon the duration of each weekend.

Know two things: 1) the underlying intent of the following price recommendation is to recover actual costs of administering and enforcing the program, 2) the purpose of the Fair Market Analysis is to ensure that the cost-recovery price is not so exorbitant as to be non-competitive to similar venues, and 3) as reflected in Table 14, the fair market values are artificially low because of the restricted events chosen for the comparison.

Specifically, we recommend \$30 per day for non-holiday periods, and \$60 per day for holiday periods. This level should recover program costs for administering and enforcing the vendor program at a vendor level of 20—see projections in Table 13. Vendors insisted that no more than 20 vendors were active at any given time and BLM records indicate that more than 100 vendor permits were issued throughout the season.

Not only do these rates recover program costs, but they also come in just below the average vendor rates displayed in Table 14 (page 45). For the typical 7-day holiday, an ISDRA vendor would pay \$455 and for Thanksgiving they would pay \$715. These compare to a Fair Market Value range of \$913 (raw average) to \$3,000 (attendance-based average). (Table 14).

Consultant further recommends that the existing \$15/day fee be increased to \$25/day and applied to mid-week days in the Gecko Vendor Pad to recognize that the vendors are conducting business on those days, but not at the weekend level, and to address the concerns by some recreationists that the vendors are getting to “camp for free; why should we have to purchase a pass?” We also recommend that the \$25 allow up to three vehicles (structures) and that an additional \$10/day be charged for each additional vehicle (structure) located within the assigned vendor site/space. Again this is to remain comparable to the \$30, 7-Day Use pass which equates to \$4.30 per day (x 3 vehicles = \$12.90 per day), leaving \$12.10 per day as a cost for mid-week selling, to recognize that most mid-week/seasonal vendors sell from a “wares trailer,” utilize an RV for camping, and keep a smaller vehicle for special trips and emergencies.

This pricing structure not only recovers the actual costs of administering the program, but will also enable the construction of vault toilets within each vending area. The vault toilets should address two issues:

- 1) season-long vendors currently haul in their own temporary toilets and contract someone to pump/replace

them—adding to the congestion of the vending area, and 2) dispersed vault toilets should also help to attract recreationists to the vending areas.

If the Vendor program happens to take in more money than projected, such revenues could be used to develop additional Vendor areas (pads if necessary) along Wash Road because of the dispersed camping patterns of existing recreationists.

While the increased pricing will likely drive away some of the marginal vendors, consultant strongly recommends that the BLM allow any and all permitted vendors to sell Use Passes by participating in the bulk purchase wholesale program—the 10% margin should enable the vendors to recoup the increased permit costs. Furthermore, the vendors will be seen as providing a service to their customers, especially the mid-week customers, by informing them of the potentially significant increase in the fine. Finally, this distribution methodology should indirectly increase mid-week compliance.

Assigned Spaces and Number of Spaces

Vending space is physically limited to specific and confined locations throughout each management area; therefore, vendors should only be allowed one “exhibit/booth” space within each management area. As stated above, the recreationists appreciate the diversity and competition of several vendors—not only for for the “atmosphere they bring to the weekend,” but especially to ensure competitive pricing to the customer. The BLM is committed to supporting the free enterprise system, and to opposing monopolistic practices which might discourage increased competition and diversity—the very tenets of free enterprise and competitive pricing.

However, recognizing that only three or four existing vendors are on-site literally full-time, season-long, and to accommodate existing vendor icons, we further recommend that the Gecko vending pad be marked off as four (4) larger sites (~90' wide by 60' deep) instead of the existing eight (8) sites of 45' by 65'.

Capacity Limits

We expect that these recommended changes in pricing will significantly reduce the “occasional” and “extra” vendors who rent a space to try-it-out on occasion or to sell “extra” inventory from other events or projects. Therefore, we do not anticipate selling-out the vending locations for a few years.

However, if vending space demand exceeds availability, then BLM permitting staff should implement a sealed-bid process—starting at the then existing cost recovery rates. Such a process should 1) ensure that the market determines the rates, and 2) protect the vendors from the increasing pressure from the BLM Washington office to audit their inventories, cash register tapes, beginning and ending petty cash, and financial statements on a weekly basis along with monthly and annual audits of their Board of Equalization (sales tax) and federal income tax returns.

Table 13 Vendor Cost Recovery Projections					
Fee	# Vendors	Days ¹	Daily Rate ²		Total
Holiday Weekends					
Halloween	20	3	\$ 60		\$ 3,600
Thanksgiving	20	11	\$ 60		\$ 13,200
New Year's	20	7	\$ 60		\$ 8,400
Martin Luther King	20	4	\$ 60		\$ 4,800
President's Day	20	4	\$ 60		\$ 4,800
Easter	20	7	\$ 60		\$ 8,400
Regular Weekends (24 @ 3 days each)	20	72	\$ 30		\$ 43,200
Mid-Week Fees ³ (Gecko Vending Pad)	3	116	\$ 25	per day for up to three vehicles/structures	\$ 8,700
	3	116	\$ 10	per day each additional vehicle/structure	\$ 3,480
Total Vendor Income					\$ 98,580
Vendor Program Expenses ⁴			Annual Rate		
Permit Specialist (Outdoor Rec Planner)			\$5,000		\$ (55,000)
Law Enforcement Ranger			\$5,000		\$ (15,000)
Vehicle Expense			\$ 7,000		\$ (7,000)
Dumpster Service			\$ 9,000		\$ (9,000)
Toilet Service			\$ 5,000		\$ (5,000)
Misc & Contingency (10%)					\$ (9,100)
Total Vendor Expense					\$(100,100)
Net Income / (Loss)					\$ (1,520)

Notes:

- 1) Days - While the RAMP delineates 12 Noon Thursday - 12 Noon Monday, all interviewed vendors stated that the weekend vendors leave Sunday afternoon or evening; therefore, we project three days revenue to avoid an overestimate of income.
- 2) Daily Rate - While our primary objective is cost-recovery, we worked with the holiday/non-holiday differential to recognize the increased value of the holiday markets, while maintaining a non-holiday rate below \$35—the inflation adjusted historical rate. We also verified that the resulting holiday rate, when extended to the entire weekend, remained below the comparable fair market values (FMV) displayed in Table 14. (e.g. Thanksgiving weekend: \$60*11 days = \$715 vis-a-vis the FMV range of \$913 - \$3,000.
- 3) Mid-Week Fees- In response to recreationist complaints that the vendors should at least pay what the recreationists pay to spend the night, \$15 was selected because it yields a similar daily rate on a per vehicle basis and represents no change from last year.
- 4) Expenses - The listed expenses are currently incurred, either directly or on a prorated basis. Vehicle expense must be included because the ORP must establish a regular, on-site presence. Misc & Coningency (10%) are for business cards, postage, packaging, bulk permit fulfillment, possible signing that may not be foreseen with this first year implementation.

Table 14, Vendor Fee Market Analysis											
	Fee / Cost						Day-Based		Attendance-Based		Size-Based
Site / Event ^{1,2}	Fee	Dimens	Sq Feet	Parking (RV/ O'nite)	In s	Food	Total Days	\$\$\$ / Day	Total Attend	\$\$\$ / 1,000 / Day	\$\$\$ / Sq. Foot / Day
Fairs											
Imperial County	\$ 475	10' x 10'	100	\$ 0	\$0	\$ 0	10	\$ 47.50	101,027	\$ 0.47	\$ 0.48
Kern County	\$ 900	10' x 10'	100	\$ 240	\$0	\$ 0	12	\$ 95.00	500,000	\$ 0.19	\$ 0.95
Los Angeles County											
Cheapest Square Footage	\$ 2,560	12' x 25'	300	\$ 0	\$0	\$ 0	17	\$ 150.59	1,700,000	\$ 0.09	\$ 0.50
Cheapest Nominal/Total	\$ 1,786	10' x 10'	100	\$ 0	\$0	\$ 0	17	\$ 105.06	1,700,000	\$ 0.06	\$ 1.05
Orange County	\$ 2,100	10' x 10'	100	\$ 0	\$0	\$ 200	21	\$ 100.00	924,000	\$ 0.12	\$ 1.10
Riverside County											
Commercial Building	\$ 700	10' x 10'	100	\$ 529	\$1	\$ 0	23	\$ 57.78	270,000	\$ 0.21	\$ 0.58
Commercial Annex	\$ 600	10' x 10'	100	\$ 529	\$1	\$ 0	23	\$ 53.43	270,000	\$ 0.20	\$ 0.53
Outside Locations	\$ 600	10' x 10'	100	\$ 529	\$1	\$ 0	23	\$ 53.43	270,000	\$ 0.20	\$ 0.53
Gem & Mineral Building	\$ 700	10' x 10'	100	\$ 529	\$1	\$ 0	23	\$ 57.78	270,000	\$ 0.21	\$ 0.58
San Bernardino County											
Commercial, Outdoor	\$ 650	10' x 10'	100	\$ 0	\$0	\$ 0	9	\$ 72.22	140,000	\$ 0.52	\$ 0.72
Food, All	\$ 1,000	10' x 10'	100	20% of Gross		\$ 0	9	\$ 111.13	140,000	\$ 0.79	\$ 1.11
San Diego County											
Minimum	\$ 840	10' x 10'	100	\$ 0	\$0	\$ 0	21	\$ 40.00	1,196,643	\$ 0.03	\$ 0.40
Maximum	\$ 2,600	10' x 10'	100	\$ 0	\$0	\$ 0	21	\$ 123.81	1,196,643	\$ 0.10	\$ 1.24
Food, All	\$ 1,500	10' x 10'	100	25% of Gross		\$ 0	21	\$ 71.44	1,196,643	\$ 0.06	\$ 0.71
California State Fair											
Commercial, Outdoor	\$ 2,000	10' x 10'	100	\$ 0	0	0	18	\$ 111.11	2,795,751	\$ 0.04	\$ 1.11
Food, All	\$ 2,000	10' x 10'	100	24% of Gross		\$ 80	18	\$ 111.12	2,795,751	\$ 0.04	\$ 1.16
AVERAGE Fairs	\$ 1,313		113	\$ 147	3	17.5	18	\$ 85.09	966,654	\$ 0.21	\$ 0.80

¹ Each event (except the state fair) includes one 50 amp electrical circuit; the BLM OHV Vending areas do not.

² Each event includes at least two admission tickets/passes for the duration of the event.

³ Note that these "Averages" are particularly misleading. For example, some of these "normal" weekends experienced visitation exceeding

Table 14, Vendor Fee Market Analysis

	Fee / Cost						Day-Based		Attendance-Based		Size-Based
Site / Event ^{1,2}	Fee	Dimens	Sq Feet	Parking (RV/ O'nite)	In s	Food	Total Days	\$\$\$ / Day	Total Attend	\$\$\$ / 1,000 / Day	\$\$\$ / Sq. Foot / Day
Private Expos											
Sand Sports Super Show	\$ 500	10' x 10'	100	\$ 0	0	0	2	\$ 250.00	70,000	\$ 3.57	\$ 2.50
Off-Road Expo											
Outdoor	\$ 300	10' x 10'	100	\$ 0	0	0	2	\$ 150.00	40,000	\$ 7.50	\$ 1.50
Indoor	\$ 600	10' x 10'	100	\$ 0	0	0	2	\$ 300.00	40,000	\$ 15.00	\$ 3.00
Sports, Vacation & RV (Quartzsite, AZ)	\$ 650	20' x 40'	800	\$ 235	0	0	9	\$ 98.33	100,000	\$ 8.85	\$ 0.12
Average Private Expo	\$ 513		275	\$ 59	0	0	4	\$ 199.58	62,500	\$ 8.73	\$ 1.78
RAW Average Fairs & Expos	\$ 913		194	\$ 103	1	8.75	11	\$ 142.34	514,577	\$ 4.47	\$ 1.29

MARKET ANALYSIS APPLIED TO ISDRA: DAY-BASED FEE		# Days	times	Average \$\$\$ / Day	Day Based Fee	Cost Recovery Based Fee	Savings / Weekend
3-Day Weekend ("Normal" - 12 Noon Friday through 12 Noon Monday)		3	x	\$ 142.34	\$ 427	\$ 250	\$ 177
7-Day Holiday Weekend ("Normal Holiday" - 12 Noon Friday through 12 Noon		7	x	\$ 142.34	\$ 996	\$ 500	\$ 496
11-Day Major Holiday ("Major Holiday" - 12 Noon Wednesday through 12 Noon		11	x	\$ 142.34	\$ 1,566	\$ 500	\$ 1,066

MARKET ANALYSIS APPLIED TO ISDRA: ATTENDANCE-BASED FEE	# Days		Average Attendance (000)/2		Average \$\$\$ / 1,000 / Day	Attendance Based Fee	Cost Recovery Based Fee	Savings / Weekend
3-Day Weekend ("Normal" - 12 Noon Friday through 12 Noon Monday)	3	x	17	x	\$ 4.47	\$ 221	\$ 250	\$ (29)
7-Day Holiday Weekend ("Normal Holiday" - 12 Noon Friday through 12 Noon	7	x	17	x	\$ 4.47	\$ 516	\$ 500	\$ 16
11-Day Major Holiday ("Major Holiday" - 12 Noon Wednesday through 12 Noon	11	x	61	x	\$ 4.47	\$ 2,999	\$ 500	\$ 2,499

MARKET ANALYSIS APPLIED TO ISDRA: SQUARE FOOTAGE-BASED FEE	# Days		Square Feet (45' x 65')		Average \$\$\$ / Sq Foot	Square Footage Based Fee	Cost Recovery Based Fee	Savings / Weekend
3-Day Weekend ("Normal" - 12 Noon Friday through 12 Noon Monday)	3	x	2,925	x	\$ 1.29	\$ 11,320	\$ 250	\$ 11,070
7-Day Holiday Weekend ("Normal Holiday" - 12 Noon Friday through 12 Noon	7	x	2,925	x	\$ 1.29	\$ 26,413	\$ 500	\$ 25,913
11-Day Major Holiday ("Major Holiday" - 12 Noon Wednesday through 12 Noon	11	x	2,925	x	\$ 1.29	\$ 41,506	\$ 500	\$ 41,006

COMMUNICATION STRATEGY

The purpose of the Communication Strategy is four-fold:

- To inform the primary user groups and regular visitors of the imposition of fees so that no one is surprised by an unexpected fee upon arrival next season,
- To communicate the basis of the fees so that paying customers recognize the true costs of recreating at each site,
- To involve the paying customers in shaping the site-specific programs, services and delivery of the same, and
- To increase understanding of the interdependency of resource protection, self-sufficiency, improved inter-group relations, and legal requirements as keys to keeping the site open.

The BLM customer base perceives this document to be a Revenue Generating Plan, not a Business Plan—accept that perception and don't argue about it. The only way to overcome such a perception is through forthright communication and performance. Provide services that your customers request or that are legally required—do not add services that sound good to you, but for which your customer base does not want to pay.

Costs for services must be realistic and explained in simple terms. For example, if you spent \$26,000 in dust pallatives last year, do not budget a cost of \$670,000 this year. Even if the \$670,000 cost is a realistic number in the long-run, phase it in, do not make such a huge jump in one year. If you're currently operating with one Park Ranger and want to increase to two Park Rangers and an LEO Ranger, explain the rationale behind the desire and obtain feedback and suggestions from your customers.

Government bureaucracies are generally command and control. That is, their annual plan is driven either from above or from within, or from regulatory compliance; but is seldom customer-driven. Therefore, one of the most difficult transitions for agencies moving into fee-dependency is to learn to communicate with and to positively react to their customers. The old adage that *"the customer is always right"* addresses personnel attitudes and interactive communication skills, not giving-in to customer demands at every complaint. For example,

"Yes, you're right. In fact, most of the staff probably agree with you, taxes should probably be paying for these facilities, but they are not. Congress only provides us with \$xxx,000 per year to manage this area—the same amount that we've been allocated for the past twelve years. Now that OHV Trust Fund Grants are being reduced we have to do something to keep the site open, and the beauty of this new fee program is that the money stays right here and is only spent in this area. No more sending it back to Washington and hoping they'll send it back to us—as with film permits. The money raised here, stays here and you get to be involved in how it is spent."

Implementation

Implementation is going to be frustrating and challenging. The more personal faces that you can put with implementation, the better. The more volunteers that you can involve, the better. Therefore, approach the organization leadership first and identify your key supporters and protagonists; then work directly with them. Work with supporters to help spread the word and to get positive criticism as well as suggestions on how best to

communicate certain issues. Work with protagonists to determine if you have, in fact, overlooked, or assumed something. If so, correct it. If not, work with them to demonstrate that you are not a command-and-control institution implementing a Revenue Generating Plan, but a responsive bureaucracy attempting to transition to a customer-driven organization.

Most, if not all user groups have been informed of this Business Plan development. Therefore, announcing and delivering it will not come as a surprise, but seeing actual numbers/prices for the first time always surprises—especially for services that, heretofore, were paid for through appropriations and OHV Trust Funds. Thus, you should prepare your public-contact staff to support the numbers that you have provided within this business plan. For example, most law enforcement organizations plan and detail LEOs based upon observed ratios per 1,000 visitors, but the ISDRA general staff are not familiar with these ratios or how the ratios were developed. Neither is it likely that all of your public contact staff will be directed to read this document; let alone to comprehend and retain all of it. It is not sufficient to point at a page within a business plan and quote the numbers—our staff must be positive and committed in defending this new fee structure. Therefore, ISDRA management staff should develop a simple overview of the business plan to distribute to all on-the-ground staff (the summary section provides a good start), and perhaps an index card-size flip chart for quick-and-easy reference within each entry station and vehicle.

Staff and volunteers should work together (in teams of two) within the entrance stations and on ride-alongs to visit campsites—**not an enforcement methodology, but a communication task**. Such teams should ask for feedback and communicate your excitement about keeping the money "here." Questions should ask what, if any, site improvements the visitors would like to see; what, if any, problems the visitors have encountered and, of course, how long they've been coming to the ISDRA in general and the specific management area in particular.

Signing

Install signing along each main entrance/access route, the major staging areas, and at each kiosk and toilet as soon as possible—not later than September 1, to announce the new fee schedule and commencement date.

"Dollars at Work" signs work. "Everyone" makes fun of them. We might disagree with the specific project. BUT, we see that the money is being spent where the "bureaucrats" said it would be spent. Score one for the bureaucrats.

However, "Dollars at Work" signs are rather like billboards—too cluttered and nothing is actually retained. Therefore, smaller, site-specific signs that say little more than "Your Fee Dollars at Work" are preferred to a large entrance banner that lists all of the projects within the project area. Specifically, affix signs on your vault toilets, dumpsters, quads, and especially rescue buggies with simple, large-print text that reads "Permit Fees @ Work". A portable (or permanent) pole sign (with the same wording) should also be erected adjacent to each group of portable toilets that are delivered for the major holiday weekends and events. Note that the old *Berma Shave* signs still prove especially effective along lengthy access roads.

Kiosks

Existing kiosks should be redesigned or repaired to

present a more professional appearance—especially the one on Gecko Road. Notice the difference between the California State Parks sign, the El Mirage sign board, and the ISDRA sign in the three images below. As stated earlier, each site should also install more than one Kiosk to ensure maximum exposure—near each vault toilet, near each vending area and, where they exist, near each Ranger Station.



Mitchell Caverns State Park



El Mirage



Imperial Sand Dunes

Park Rangers should also ensure that the brochure racks are stocked on a regular basis and should include a suggestion box. One section could provide more detailed instructions about operating the machines, especially remembering to take your receipt.

We discussed a promotional goal of the kiosks to promote spatial and temporal displacement, but they can also be used to provide and solicit feedback from customers. The expenditure pie chart suggested for the customer feedback cards could be enlarged to poster size to communicate to those who do not pick up cards. It should also have a note encouraging the viewer to pick-up, complete, and return the actual card. *(Perhaps add an incentive, such as a monthly drawing for a free season pass (non-holiday) for the next season).*

If vandalism becomes a problem, you could even try a humorous approach next to the above poster, something to the effect of "Sound Off: Don't abuse the sign, send in a card and we'll post your comments here and on the Internet!" Remember a basic marketing tenet: "sounding off," or "being heard" is often all that the customer wants

and needs. Furthermore, the best innovations often come from the customers/end-users themselves.

One service that should be provided by the increased Park Ranger staff, and displayed on each kiosk and on the Internet, is a coordinated master calendar for each Project Area/Site. This would also provide some increased benefit/value to event permit holders as it would be a constant promotional reminder to visitors to come back for events.

Enforcement

When comparing the new fees to the National Parks, several visitors have pointed out that they schedule their trips to the National Parks so that they actually arrive after the entrance station is closed and leave before it opens the next morning. While this must be more of a "road trip" than a site visit, it does raise a valid point—*entrance station hours are a critical component of compliance*. Personnel issues, diversity of job descriptions and weekend fluctuations necessitate flexible checkpoints scheduling, but the checkpoints must be staffed during the high-use periods of every weekend. The existing self-pay machine contractor has expressed a willingness to enforce the permit requirement; however, BLM regulations require the presence of an LEO Ranger to actually issue tickets. Therefore, detailing the new LEOs to on-the-ground entrance/exit stations to support existing BLM staff and contractor staff should be a high priority.

Entrance station staff should also keep track of the daily traffic—a built-in survey—number of permitted (Use) vehicles, multiple trips by same permitted vehicle, number of street-legal units per vehicle (to include camping trailers, RVs towing auto, etc), number of green sticker vehicles, and number of passengers per permitted vehicle.

In October, an LEO and Park Ranger should make campsite visits to

- 1) disseminate information,
- 2) verify Use Passes and either sell a Permit on-the-spot or tell visitors to pick one up at the entrance station the next morning. (The Self-Pay machines, provide a convenience to customers when the stations are not open).
- 3) inform that an exit check will begin on the Halloween weekend; therefore, it will be easier on their departure if they purchase passes prior to their visit, or at the least, upon arrival, and
- 4) inform that the LEOs will begin issuing tickets for non-compliance in November.
- 5)

Direct Mail

EL Centro and BFO Field Offices should make a combined mailing (suggest two separate inserts within one envelope) that announces the new rates at the ISDRA and the new fees throughout the BFO to all of the existing ISDRA permit holders—whose addresses EL Centro has on record—as well as to all interested mailing lists at both Field Offices. The mailing should also be sent to the BLM National Mailing Database sub-list that each Field Office normally pulls for various announcements.

The separate inserts are recommended to avoid the assumption that one pass is good for the ISDRA and BFO. Piggybacking the same mailing will save postage costs, get-the-word out simultaneously (to avoid temporal displacement motivated, incorrectly, by fee avoidance), and lessen the negative reaction of the new BFO fee in light of comparing it to the El Centro fee. (El Centro is mandated, through the RAMP, to minimize existing visitation levels and impacts, and therefore, is less

concerned about negative reactions than is the BFO).

Internet

e-mail list

Each office should send a similar, but separate, e-mail notification to all interested e-mail lists that they maintain. Separate e-mail notifications will avoid a false perception that one permit is good for both the ISDRA and the BFO areas. As with the direct mail approach, sharing each office's distribution lists ensures that the word-gets-out (and what better way than word-of-mouth through various informal affiliations that transcend Field Office boundaries, but that are not recognizable through our internal mailing lists and user group affiliations).

web site

The BLM website has a tremendous amount of information available, but it is difficult to access. If you are intimidated by search engines or make a simple typo, you'll strike-out. The Fee program is so new and controversial and so directly impacts customers on-the-ground that the state website should have a highly visible link to "Fee Demo Use Passes" with a sub-link to "Use pass Areas/Sites."

Also, each Field Office web site (throughout the state) should have a highly visible link to CURRENT or NEW Fee Information—ideally with one of the popular starburst icons helping to call attention to it.

Telephonic Information

The BFO El Mirage Recreation Area currently has an information telephone number that is primarily used for special events, such as El Mirage (Clean-up) Days. The ISDRA should implement a telephone line and machine that provides 1) Event Information, 2) Fee Information and 3) Contact Information (other numbers and names, or forward the call to an existing number already serving that purpose).

For example, the opening message could say *"Thank you for calling the Imperial Sand Dunes Recreation hotline and believe-you-me, it is hot out there! For information about Use Fees, press 1. For info about upcoming events, press 2. For all other information requests, please press 3. Thank you and remember to 'play hard, play safe..."* (tie into billboard campaign/phraseology).

Linked message number 1 could state: *You've requested current info about Use Fees at the Imperial Sand Dunes. This recording provides an overview of our fees. For more detailed information, please visit our Use Fee web page at www.ca.blm.gov/elcentro/ that's e-l-c-e-n-t-r-o and follow the Use Fee link. Our new fee structure was developed by an independent contractor with on-the-ground input from you—our customers. It is designed to recover our costs without making money and without losing money. Yes, we're proud of this new fee structure because it remains less expensive than National Park Service or Forest Service passes—while keeping your open areas open, instead of restricting you to designated trails. It comprises three levels of Passes—Passports to Sand as we like to call them. Two passes are for 7-day periods and one pass of season-long duration. The differences being cost and dates—specifically, our six busiest holiday weekends cost more. That's Halloween, Thanksgiving, New Years, Presidents, Martin Luther King, and Easter. Passports for individual holiday weekends are \$60 for the 7-day holiday period, or you can purchase an all-holiday, all-season, unlimited access*

pass for just \$180. Passes for all other weekends throughout the year only cost \$30 per 7-day period. Our on-site pass machines accept credit cards as well as cash. You may also purchase passes online at www.ca.blm.gov/store..., through your OHV association, or via the telephone by calling Thank you for calling the Imperial Sand Dunes.

Linked message number 2 could state: *You've requested info about upcoming events at the Imperial Sand Dunes. As of (state recording date) the following events are scheduled: Dunes Clean-up on mm/dd/yy, Junior Rangers on mm/dd/yy and Youth ATV certification on mm/dd/yy. Please visit our Event web page at www.ca.blm.gov/elcentro/ that's e-l-c-e-n-t-r-o and follow the Event link for more detailed information. Thank you for calling the Imperial Sand Dunes.*

Linked message number 3: *You've requested contact information for the Imperial Sand Dunes. This same information is also available on our Contact web page at www.ca.blm.gov/elcentro/ that's e-l-c-e-n-t-r-o and follow the Contact Us link. The on-site ranger station may be reached at 760-344-3919. Passes may be purchased by calling 760-xxx-xxxx. Law Enforcement and Emergency Medical Services questions should be directed to 760-xxx-xxxx. Vending inquiries can be made at 760-xxx-xxxx. The project manager is available through 760-xxx-xxxx. The El Centro Field Office manages the Dunes for the BLM and the main number is 760-337-4400.*

Feedback / Surveys

The comment cards included in Appendix 1 should be made available at all information kiosks, ranger stations, entrance stations, and Field Offices. The survey included in Appendix 2 should be available through direct mail, the Internet, and upon request (that is recognizing someone that wants to provide serious input) at ranger stations, entrance/exit stations, campsite visits, and Field Offices.

BLM Washington regulations designed to protect the individual privacy of the general public are so strict that local ECFO staff conducted surveys require most of a season just to obtain approval. Therefore, ECFO staff should work closely with the various user groups to avoid this built-in delay and rigidity. All involved organizations must exercise caution to protect individual privacy through questionnaire design, but together they should be able to implement more valuable survey and decision-making tools.

Special Interest Groups / Associations

While BLM staff and this consultant have been testing customer reactions to various fee levels since April, two or three joint user group presentations should be made throughout the summer to announce the actual fees. As previously discussed, *"To Fee or Not to Fee"* is not the purpose of the meeting, rather information sharing, opening lines of communication and identifying glaring errors in the number-crunching process.

The Key Messages to communicate should include:

- The ISDRA OHV Open Areas is a unique and important resource for recreation and commercial activities, and is unduplicated in southern California.
- One of the major goals throughout the BLM is to allow OHV recreational activities to continue with a minimum of agency intervention.
- Since the 1980s much of the funding for the ISDRA has been provided by OHV Trust Fund grants with the understanding that the project would become self-

supporting through user fees.

- Fee expenditures must be shared with the public, and a review process developed in cooperation with the various user groups.
- The Fee Demonstration Program was proposed, developed and enacted by congress, as a means of better funding recreational programs on public lands, by allowing the collection of user fees and allowing the collected fees to be used on-site in the area where they are collected, rather than sending them to the national treasury, and re-appropriating them.

Targeted user and representative groups should include:

- American Sand Association
- American Motorcyclists Association
- California Off Road Vehicle Association (CORVA)
- California 4WD Clubs
- DUNERS
- San Diego Off-Road Coalition (SDORC)
- Off-Road Business Association (ORBA)

Vendors

Previous vendors should be contact through direct mail, and current vendors at the time of application, with the same information as just discussed with the User Groups. Not only are they being offered another item to “sell,” but more importantly, they have an opportunity to provide a customer service to recreationists that will draw them to their business.

Green Sticker Renewals

Work through the OHMVR to either develop an “insert,” or a small announcement to be included in an existing OHMVR insert that will be mailed to all Green Sticker renewals. While this strategy represents a less-effective “shotgun” approach, it will help to spread the message through informal, word-of-mouth associations.

Trade Shows

ISDRA staff should continue to attend the two or three most popular OHV Trade Shows in the southern California area to promote the new fee schedule and the intended benefits and services. Specifically, three of the following expos: Sand Sport Super Show (Fall ~ September, Costa Mesa), CORVA Off-Road Recreation Show (Spring ~ March [tentative]), Off-Road Expo (Fall ~ October, Pomona), and Speed Sports Expo (Summer ~ August, Anaheim).

ISDRA staff should coordinate trade show attendance with BFO staff—each attending different shows, but rotating which show each attends from year-to-year. This will provide constant BLM representation, while enabling a changing display and representation. After two years, staff from the two areas should discuss the value of continuing the rotation, or if two or three specific shows better suit one of the areas more than the other shows.

Media—Print and Radio and Local Cable

Field Offices should utilize Public Service Announcements (PSAs) to the fullest extent possible. However, such announcements and Press Releases might need to be coordinated through local not-for-profits, such as the the

ASA, ASF and DUNERS—depending upon the local outlet’s PSA policies toward government agencies.

This is not actually as high a priority as the preceding suggestions, but it is a method that might communicate with those individuals who are not affiliated with any particular OHV organizations and who have not made contact BLM Field Offices in the past.

Elected and Appointed Public Officials

Communication with public officials should be ongoing. It should serve two purposes:

- keep the officials and their staffs informed about the status of the fee program and reactions from the recreating public so that they are not “caught unawares” while attending other public activities and events, and
- provide talking points to enable the officials and their staffs to understand the rationale behind the need for fees and the fee structure itself. (*Note, you are not equipping them to defend your fees, just to be confident that you did your research and development through a rationale decision-making process; not “just to make money.”*).

Send state and federal elected officials a personal letter informing them when the plan will be released and ask if they would like to receive a hard copy when it is distributed. It is doubtful that you will hear from them, but if you do receive a phone call, be sure to use the opportunity to ask the staff person calling what prompted their interest and what they’ve been hearing about it from their constituents. Verify contact information and ask them which address and telephone are the best to use for communicating with them (i.e. district office, Sacramento or Washington office, snail mail, and/or e-mail).

Follow-up two weeks later with a personal cover letter and a hard copy (unless they specifically tell you not to send them a copy) of the actual plan.

Two weeks later, send them a follow-up letter summarizing the reactions that you are receiving from the recreationists and user groups, as well as your state office. Please note that this is not creating busy work for you, it will help you to focus and react to the issues being raised and it will prepare the officials for otherwise unexpected encounters with the public. Include a separate FAQ (Frequently Asked Questions) sheet of the top ten questions/criticisms you have encountered and your responses.

In mid- to late September, send them a copy of each of the brochures that you are distributing to the OHV community.

In December, send them a final personal letter that summarizes customer reactions through the Thanksgiving holiday and especially thank them for their support and assistance through your challenging implementation period. Also include an invitation to a personal tour at their convenience.

Do not use a photocopied form letter for any of these letters. Even if the bulk of the letter is not personal, you should incorporate it into a mail-merge routine so that each official receives a personally addressed and personally (use a blue ink pen) signed letter.

Appendix 1 - Customer Feedback Card

The following page provides a sample layout for a new CUSTOMER FEEDBACK CARD to be distributed at each Point-of-Sale and information kiosk throughout the Imperial Sand Dunes Recreation Area (ISDRA).

As indicated on the sample, it is designed to contain a single fold instead of the current dual-fold design, and it attempts to:

- provide more site-specific information about the use of fees (accountability reporting),
- provide an opportunity for the customer to express his/her view as to the best use of his/her fee,
- solicit basic demographic information that can be used to initiate a customer-demographic database,
- solicit (indirectly through the blank lines in the return address section), the mailing address of the respondent—to which a more detailed, follow-up survey could be sent.

If a change in these questions is desired, it should be coordinated with the Barstow Field Office because they are utilizing the same card at each of their recreational areas, and a consistent format throughout California Desert District Field Offices will provide valuable comparative data.

The example pie chart and table are just that—an example. ISDRA staff should be given the flexibility to group, and label categories as best-fit their area/site objectives—based upon direction from the TRT and in-the-field conversations.

The response mechanism should definitely be a Postage-Paid, Business Reply self-mailer. The final design/print should actually state “tear” here at the center fold (perforation if within the departmental budget and specifications). Of course, a collection/drop slot should be incorporated into each POS and information kiosk sign to allow the customer to drop-it-in-on-the-spot, but it must be pre-printed with the correct Postage-Paid layout and bar codes to ensure the proper “image” as well as to reinforce the sincerity behind the solicitation.

Name: _____
 Mail Address: _____
 City: _____
 State/Zip: _____

NO POSTAGE
 NECESSARY
 IF MAILED
 IN THE
 UNITED STATES

BUREAU OF LAND MANAGEMENT
 Site/Project Name Here
 Recreation Survey
 Bureau of Land Management
 2601 Barstow Road
 Barstow, California 92311



The above sign indicates that you are entering a recreation area that charges a fee.

- We are reinvesting the fees back into the sites where they are collected—none goes back to Washington.
- Fees are based upon comparisons with other local facilities and actual costs of operation.

Fees are utilized for:

- Visitor facility repair and maintenance
- Natural/Cultural history exhibits, talks & tours
- Visitor Services (information and emergency)
- Signs
- Habitat Improvement
- Facility Enhancement
- Resource Conservation, and
- Law Enforcement Related to Visitor Activities

Tell Us
How You Want the Money Spent

Purpose

This recreation area is managed by the Bureau of Land Management (BLM), a Federal agency within the U.S. Department of the Interior. We are participating in a 3-year Recreation Fee Demonstration Program as directed by Congress. The purpose is to test the effectiveness of collecting fees versus increasing general taxes on the populace.

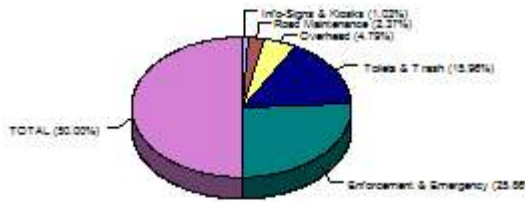
SIDE ONE (Outside when folded)

For those not familiar with the existing card, it is folded vertically along the dashed line.

Why are these Fees Necessary?

While Federal appropriations pay for most of our administrative overhead, the BFO has been dependent upon OHV Trust Fund Grants (*from state "Green Sticker" fees*), for on-site funding, such as rangers, law enforcement, emergency services, roadway maintenance, toilet pumping and cleaning to name a few. However, recent political and legal changes now earmark the majority of *Green Sticker* funds for conservation and restoration projects on OHV lands. Therefore, these fees are intended to replace the lost Green Sticker grants and to ensure a consistent, on-going level of service as requested by our recreationists..

Here's how we intend to reinvest THESE FEES:



Expense Item	Fee Income (\$)	Percent of Total
New Infrastructure	\$1	12%
Site Maintenance	\$2	24%
Accountability & Communication	\$1	12%
Customer Support & Law Enforcement	\$4	47%
Collection	\$1	6%
TOTAL FEE EXPENSES	\$9	100%

Thank you for providing your suggestions on how we can best use your fee to serve you.

Please indicate the date(s) you visited this site:

I would like to see our fees invested in:

Campsites, More	Park Rangers	Signs, Interpretive
Campsites, Formal	Parking, More	Trail Maintenance
Drinking Water	Shade Ramadas	Trash Cans
Emergency Phone	Showers	Trash Dumpsters
Law Enforcement Rangers		Toilet Cleaning
Entrance Road	Signs, Directional	Toilets, More
Loading Ramps	Signs, Informational	Toilets, Permanent
Other:		

Please help us to know our customers by **CIRCLING** the appropriate answers to the questions below to indicate:

- 1) YOUR GENDER: Male Female
- 2) YOUR AGE GROUP:
5-17 18-30 31-45 46-60 61+
- 3) HOW FAR THIS SITE IS FROM YOUR HOME (*BY AUTO*):
< 1hour 1-2+ hours 3-4+ hours > 5 hours
- 4) HOW LONG YOU STAYED AT THIS SITE (*THIS VISIT*):
Morning Afternoon Evening All Day Overnight
Mid-Week Weekend 2-3 Days 4-7 Days > 7 Days
- 5) WHAT DAY YOU ARRIVED ON THIS VISIT:
Mon Tues Wed Thurs Fri Sat Sun
- 6) WHEN YOU DEPARTED ON THIS VISIT:
Mon Tues Wed Thurs Fri Sat Sun
- 7) HOW MANY TIMES YOU VISITED THIS SITE DURING THE PAST 12 MONTHS:
1-2 3-4 5-6 7-8 9-10 > 10
- 8) HOW YOU LEARNED ABOUT THIS SITE:
Brochure Mailer Internet Magazine
Newspaper Radio Television Word of Mouth
Agency Chamber of Commerce Visitor Bureau
- 7) HOW WE CAN BEST COMMUNICATE WITH YOU:
Brochure Mailer Internet Magazine
Newspaper Radio Television Word of Mouth
Agency Chamber of Commerce Visitor Bureau
- 8) WHAT IS YOUR HOME POSTAL/ZIP CODE: _____
OR COUNTRY/PROVINCE/TOWN: _____

Tear along perforation and drop in the adjacent receptacle, or any US Postal Service mailbox.

SIDE TWO (Inside when folded)

For those not familiar with the existing card, it is folded vertically along the dashed line.

Appendix 2 - Internet & Direct Mail Survey Instrument

This page merely suggests the questions that should be incorporated into an online form, but does not attempt to present any particular layout because the coding and end result are too disparate. *Some of the suggested questions are more specific to the individual and will, therefore, require approval from Washington.* Ideally, the BLM web administrators will *program the appropriate questions to load based upon the site selected by the "surfer,"* and set the form to automatically update the customer-demographic database on submission.

Note that question 22, Annual Household Income needs a decision as to the most appropriate income ranges. The ranges that we used below reflect the *Income Limits for Each Fifth and the Top 5% of U.S. Households* as recorded by the US Census Bureau. Consideration should be given to relating to some standardized, federal measure for future analysis which may be facilitated by information from other agencies.

PLEASE HELP US TO UNDERSTAND YOUR RECREATION NEEDS BY **CHECKING** THE MOST APPROPRIATE ANSWERS TO THE QUESTIONS BELOW **TO TO INDICATE:**

<p>1) YOUR GENDER: Male Female</p> <p>2) YOUR AGE GROUP: 5-17 18-30 31-45 46-60 61+</p> <p>3) HOW FAR THIS SITE IS FROM YOUR HOME (<i>BY AUTO</i>): < 1hour 1-2+ hours 3-4+ hours > 5 hours</p> <p>4) HOW LONG YOU STAYED AT THIS SITE (<i>THIS VISIT</i>): Morning Afternoon Evening All Day Overnight Mid-Week Weekend 2-3 Days 4-7 Days > 8 Days</p> <p>5) WHAT DAY YOU ARRIVED ON THIS VISIT: Mon Tues Wed Thurs Fri Sat Sun</p> <p>6) WHEN YOU DEPARTED ON THIS VISIT: Mon Tues Wed Thurs Fri Sat Sun</p>	<p>7) Number of times you visited this site during the past 12 months: 1-2 3-4 5-6 7-8 9-10 > 10</p> <p>8) HOW YOU LEARNED ABOUT THIS SITE: Brochure Mailer Internet Magazine Newspaper Radio Television Word of Mouth Agency Chamber Commerce Visitor Bureau</p> <p>9) HOW WE SHOULD PROMOTE THE SITE TO REACH YOU: Brochure Mailer Internet Magazine Newspaper Radio Television Word of Mouth Agency Chamber of Commerce Visitor Bureau</p> <p>10) Whether you usually travel: Alone As a Family As a Non-Family Group</p>
--	--

11) The activities in which you/your group participate at this site (check all that apply):

Drive Rails / Buggies	Ride Mountain Bikes	Camp	Study Geology
Drive 4x4 vehicles	Ride Horses	RV-it	Rockhound
Ride ATVs (3-wheelers)	Group Sports	Special Event	Visit Family & Friends
Ride Quads (4-wheelers)	Launch Model Rockets	Photograph	Other: _____
Ride Motorcycles	Hike	Drink (alcohol)	_____
Ride Mini-Bikes	Picnic	Relax	

12) The SINGLE most important reason for your visit to this site: (Check ONLY ONE):

Drive Rails / Buggies	Ride Mountain Bikes	Camp	Study Geology
Drive 4x4 vehicles	Ride Horses	RV-it	Rockhound
Ride ATVs (3-wheelers)	Group Sports	Special Event	Visit Family & Friends
Ride Quads (4-wheelers)	Launch Model Rockets	Photograph	Other: _____
Ride Motorcycles	Hike	Drink (alcohol)	_____
Ride Mini-Bikes	Picnic	Relax	

13) Other similar sites that you frequent: _____

14) The two (2) things you like best about this site:

Campsites, More	Loading Ramps	Signs, Informational	Trash Dumpsters
Campsites, Formal	Park Rangers	Signs, Directional	Toilet Cleaning
Drinking Water	Parking, More	Signs, Interpretive	Toilets, More
Emergency Phone	Shade Ramadas	Trail Maintenance	Toilets, Permanent
Law Enforcement Rangers	Showers	Trash Cans	Entrance Road
Other: _____			

15) The two (2) things you like least about this site:

Campsites, More	Loading Ramps	Signs, Informational	Trash Dumpsters
Campsites, Formal	Park Rangers	Signs, Directional	Toilet Cleaning
Drinking Water	Parking, More	Signs, Interpretive	Toilets, More
Emergency Phone	Shade Ramadas	Trail Maintenance	Toilets, Permanent
Law Enforcement Rangers	Showers	Trash Cans	
Entrance Road	Other: _____		

16) Your overall level of satisfaction with Visitor Service and Ranger Staff

Very Satisfied Satisfied No Opinion Not Satisfied Very UnSatisfied

17) How does this site compare to those that you just listed:

One of the worst Better than most Average Worse than Most Don't Know/No Opinion None listed

18) Your overall level of satisfaction with brochures, signs and maps at this site:

Very Satisfied Satisfied No Opinion Not Satisfied Very UnSatisfied

19) How strongly each of the following issues influence your decision to visit this site:

Ability to use my own equipment	Family Recreation	Low-Cost	Signs
Adequate and maintained facilities	Freedom from Rules & Regulations	Natural Beauty	Toilets
Cleanliness, not littered	Friendly, Informative Rangers	Parking Spaces	Trails
Convenience	Garbage Disposal/Dumpsters	Picnic Areas	
Drinking Water	Law Enforcement	Safety	

20) Ways in which you have dealt with Rangers:

Assistance Information Emergency Medical Service Interpretation/Nature Talks
Law Enforcement Other: _____

21) How often you saw Rangers in this area:

Never Seldom Sometimes Often Always

22) Your overall level of satisfaction with facilities and facilities maintenance:

Very Satisfied Satisfied No Opinion Not Satisfied Very UnSatisfied

23) The last/highest year of education you have completed:

Elementary/Mid-High/High School:	1	2	3	4	5	6	7	8	9	10	11	12
College:	13	14	15	16		Graduate:	17	18	19	20+		

24) Your ANNUAL HOUSEHOLD income:

< \$15,400 \$15,401 - \$29,200 \$29,201 - \$46,000 \$46,001 - \$71,500 \$71,501 - \$126,550 > \$126,550

25) What is your HOME postal/zip code: _____, or COUNTRY/PROVINCE/TOWN: _____

26) Your place of birth (STATE/PROVINCE AND COUNTRY): _____

27) Primary Language that you speak: _____

28) Other Languages that you speak: _____

OHV (OFF-HIGHWAY VEHICLE) RELATED QUESTIONS

29) Typical amount of time you spend "off-roading" each day:

1-4 hours 5-8 hours 9-12 hours > 12 Hours

30) How you transport/tow your OHV to the site:

Truck RV Sedan Trailer 4x4 Ride/Drive

31) Which type of riding you most prefer:

Dunes 4x4 Routes Motorcycle Hill Climbs Dirt Roads Specialty Tracks Trails Other

32) Open-Ended Comments:



NOTICE OF VIOLATION

Your current use authorization has expired.

Use authorizations expire at 2:00 PM on the date indicated on the fee receipt/window sticker.

Either purchase a new use authorization at the pay station if you plan to stay, or if you plan to leave, please do so at once.

IMPORTANT

GIVE THIS NOTICE OF VIOLATION TO THE ATTENDANT AT THE PAY STATION WHEN YOU PAY.

Failure to comply with this notice may result in a citation being mailed to the registered owner of:

Vehicle License Number _____ State _____ Make _____ Model _____

Time of notice _____ Date of notice _____



BLM WARNING

This vehicle, License No. _____ ; or property,

has been observed or we have received a complaint that it
has been present at the following location:

Time

Date

Officer

P#

NOTICE

Your attention is directed to the statement(s) following the
box(es) checked. You must remove this vehicle/property
immediately or it is subject to being impounded and you
may be subject to criminal prosecution.

☐ Vehicle left after hours in an area posted closed at
specific hours. (43 CFR 8365.2-3.f.)

☐ Vehicle left in an area temporarily closed to public
use and access. (43 CFR 8365.2-3.f.)

☐ Vehicle Parked illegally: Obstructing Travel Lane,
No Parking Zone, Handicapped Zone, Off of
Designated Roadway.

☐ Your occupancy of this site is an unauthorized use
of public lands of the United States.
(43 CFR 2920.1)

☐ Other _____

This notice is an indication to officers that your vehicle/
property has been checked. For additional information call
Bureau of Land Management at 702-647-5100.

WARNING

Appendix 5 - Visitation at Various California Attractions

Top Ten National Park Facilities ¹ in California		CA State Vehicular Recreation Areas	Visitation	Top Ten California Amusement/Theme Parks ³	
Golden Gate National Recreation Area	13,961,300	Carnegie SVRA	150,020	Disneyland, Anaheim	12,720,500
San Francisco Maritime Museum	3,558,500	Hollister Hills SVRA		Universal Studios, Hollywood	5,200,000
Yosemite National Park	3,468,200	Hungry Valley SVRA	450,948	Disney's California Adventure	4,700,000
Point Reyes National Seashore	2,421,500	Oceano Dunes SVRA	1,400,000	Sea World, San Diego	4,000,000
Joshua Tree National Park	1,156,700	Ocotillo Wells SVRA	211,287	Knott's Berry Farm, Buena Park	3,624,890
Cabrillo National Monument	1,130,200	Prairie City SVRA	127,854	Six Flags Magic Mountain, Valencia	3,100,000
Death Valley National Park	932,000	Following are OHV, but NOT SVRA		Santa Cruz Beach Boardwalk, Santa Cruz	3,000,000
Sequoia National Park	923,400	Heber Dunes	29,691	Six Flags Marine World, Vallejo	1,900,000
Whiskeytown-Shasta-Trinity NRA	702,960	Mammoth Bar Auburn State	20,000	Paramount's Great America, Santa Clara	1,820,000
Channel Islands National Park	631,700	Source: Telephone calls to each area office.		Monterey Bay Aquarium, Monterey	1,719,296
¹ Based on 2002 visitation Source: National Park Service, 2003				³ Sources: Amusement Business (Year-End Issue, 2002), and the Monterey Bay Aquarium, 2003	